

FNTP STUDENT HANDBOOK

Functional Nutritional Therapy Practitioner™ Training Program



Nutritional
Therapy
Association
Australia/New Zealand

NTA STUDENT HANDBOOK

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A WARM WELCOME FROM OUR FOUNDER

Thank you for your interest in registering for the NTA's Nutritional Therapy Training programs.

I founded the NTA almost twenty years ago in order to teach nutrition to health care practitioners. What became almost immediately apparent to me was that in addition to teaching Nutritional Therapy to doctors, what we really needed was a whole new profession dedicated to the power of whole foods and nutrients to restore and maintain health. In 2001, in a cooperative effort with South Puget Sound Community College, we launched our first class and graduated the first twenty-seven NTPs. A new profession was born.

Since that time, we have trained over three thousand practitioners and consultants from around the world! Along with our dedicated staff of Instructors, we have taught our curriculum in venues all around the United States, and now also in Australia and Canada.

Our growing community of students and graduates never cease to amaze me. I watch them going into private practice, working alongside other healthcare professionals, adding functional nutrition to their current modalities, getting high paying jobs in the nutraceutical industry, creating podcasts, becoming professional bloggers, writing books... the list just goes on. It's an honor for me to be part of this incredible group of individuals who are actively helping to change the paradigm of our modern healthcare system toward a more holistic, functional model.

I often hear our graduates use the word "transformative" in describing our programs. For many, this comes from the transformation that happens in their own health as they apply the concepts learned from the curriculum. For others, this concept of transformation comes from acquiring the science-based skillset needed to translate their passion for health into a deeply fulfilling career path in functional, holistic nutrition.

Welcome to the Community

Yours in Health,



Gray L. Graham, BA,
NTP NTA Founder



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Online/In-Person Course Model

ONLINE COURSEWORK

For the Nutritional Therapy Practitioner Online Program, all coursework will be completed online. You are free to log in any time of day throughout each week to watch the video lectures and complete your assignments. When class begins, you will be provided with a course syllabus to ensure you complete the modules at the appropriate pace to meet the benchmarks and progress in the course.

Online assignments include (but are not limited to) case studies, multiple choice quizzes, content creation assignments, Client folders, written responses, and a capstone project.

ZOOM WEBINARS

The FNTPT program requires that students participate in instructor led webinars to build upon their skills, master course content, and learn through real world application. This interactive experience really sets NTA's program apart from a traditional online school as they allow you to enjoy the benefits of a live classroom such as direct instruction and guidance from the instructor team, an opportunity to build a community with like minded individuals, and a chance to ask questions and explore case studies in real time yet it still maintains the flexibility of online learning for the remainder of your coursework. We encourage you to attend the live calls, if possible, to interact with your classmates and provide opportunities to ask in the moment questions to your Instructor. However, we know life can sometimes conflict with these calls. In these instances, you are required to listen to the recordings and review the material presented if you are unable to participate in the live sessions.

WORKSHOPS and PRACTICAL BASED CLINICAL WORK

The Functional Nutritional Therapy Practitioner program (FNTPT) requires that students complete three workshop weekends and multiple practical sessions, during the academic term to practice interactive clinical evaluation skills and master course content. Attendance and completion of all workshops and practical sessions is mandatory to qualify for certification.

Workshops are now run in a hybrid format, with the following options available regarding attendance;

- **In person** (main centres) - *this is subject to numbers, personal health requirement preferences and current travel/ health mandate restrictions*
- **Regional Small Groups** - *this is subject to localised support and personal health requirement preferences*
- **Virtual Attendance** - *no travel requirement, students will all require a practice body (i.e. family member/ friend) for all days of workshops.*

Please note that as a student in the FNTPT program, you will be required to perform the hands-on Functional Clinical Assessment (FCA) on practice body's and may have FCA exams performed on you by instructors, course mentors, and other students if attending an in person session (unless pregnancy or health conditions dictate otherwise). This dynamic hands-on assessment tool requires extensive hands on training, which is why FNTPTs must attend all workshop weekends and complete all pre and post workshop practical sessions to obtain sufficient clinical hours. A Nutrient Test Kit is also a requirement for the practical clinical work, see the Registration pack for more information about Test Kits. Note: those attending virtually will require practice body's for all days of workshop to satisfy the clinical component.

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Informed Consent & Disclaimer

Please read the following information **FULLY AND CAREFULLY**. Failure to sign the NTA Student Handbook Contract in registration packet, which includes agreement to this form, will prohibit you from engaging in workshops and gaining certification as an FNTP.

GOALS OF FUNCTIONAL NUTRITIONAL THERAPY

The NTA's primary goal is to encourage people to become more knowledgeable about—and responsible for—their own health. Attaining optimal health through proper nutrition and balancing the Foundations is not a quick fix solution, however, and requires sincere commitment, possible lifestyle changes, and a positive attitude.

SCOPE OF PRACTICE

A Functional Nutritional Therapy Practitioner™ (“FNTP”) is a professional certified by the Nutritional Therapy Association, Inc.® FNTPs are trained to evaluate a client's nutritional needs and make bio-individual recommendations or provide follow up support for dietary changes, lifestyle choices and nutritional supplementation based on the following:

- Client Interview
- Analysis of Client's Food Journal
- Nutritional Assessment Questionnaire
- Clinical Assessment Tools

All advice and support recommendations made by an FNTP should be based on evidence-based, scientific information. An FNTP is not trained to provide medical diagnoses, prescriptions, or treatment of any medical or pathological conditions, illnesses, diseases, or injuries. No recommendation or comment made by an FNTP should be construed as medical advice or a diagnosis.

Practitioners should be knowledgeable of the right to practice nutrition in their place of residence as defined by the Council of Holistic Health Educators (<http://www.holisticcouncil.com/>).

Roles Performed by Functional Nutritional Therapy Association Practitioners:

The role of an FNTP is to provide non-biased health and nutrition information to clients, friends, neighbors, associates, and the community. They educate the public on the cost/benefit of eating unprocessed, local, fresh, nutrient dense foods and quality nutritional products that support chronic nutritional deficiencies as well as lifestyle and environmental factors that contribute to these deficiencies.

FNTPs Don't:

- Practice Medical Nutrition
- Diagnose and treat disease
- Make unproven health claims
- Misrepresent training
- Use unproven devices, assessments or therapies

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- Use network marketing or product sales in lieu of individual client education.

FNTPs Do:

- Promote a nutrient dense diet
- Focus on Foundational Nutrition and balancing the Nutritional Foundations
- Promote active lifestyles
- Teach ancestral eating principles

Distinguishing Features:

- Fresh, natural-foods basis
- Educational emphasis
- Client based, not method or product-based
- Refers to doctors for medical conditions
- Highest standard of accountability and integrity
- Uses informed consent and full disclosure forms
- Adheres to the NTA Practitioner Code of Ethics

LICENSURE

The Nutritional Therapy Association AU/NZ provides a Diploma qualification to students who have successfully met all course requirements, including a written and practical exam. Laws and regulations regarding certification and licensure requirements differ from country to country and occasionally change. **Students and FNTPs must research the laws in the country in which they intend to practice.**

HEALTH CONCERNS

If you suffer from a medical or pathological condition, you need to consult with an appropriate healthcare provider. An FNTP is not a substitute for your family physician or other appropriate healthcare provider. If you are under the care of another healthcare provider, you must alert them to your use of any nutritional supplements. Nutritional therapy can be a beneficial adjunct to more traditional care, but it may alter your need for medication, so it is important that you always keep your physician informed of changes in your nutritional program. If you are using medications of any kind, you are required to alert the FNTP to such use, as well as to discuss any potential interactions between medications and nutritional products with your pharmacist. If you have any physical or emotional reactions to nutritional therapy, discontinue their use immediately and contact your FNTP to ascertain if the reaction is adverse or an indication of the natural course of the body's adjustment to the therapy. Since every human being is unique, FNTPs cannot guarantee any specific result from nutritional therapy.

COMMUNICATION

Every client has unique bio-individual needs, and it is not possible to determine in advance how one's system will react to the nutrients it needs. It is sometimes necessary to adjust one's program until the body can begin to properly accept nutrients needed to correct imbalances. It is each client's responsibility to follow the nutrition guidelines shared by their FNTP, sufficiently exercise their body and mind, eat a proper diet, get plenty of rest, learn more about nutrition, and stay in contact with their FNTP about

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progress and changes. One's healthcare provider is free to contact the FNTP for answers to any questions they may have regarding nutritional therapy.

NTA'S CODE OF ETHICS

The Code of Ethics of the Nutritional Therapy Association is intended to support the certified members of the Nutritional Therapy Association individually and collectively in maintaining a high level of ethical conduct.

The standards are used to determine the propriety of conduct in relationships with clients, colleagues, members of allied professions, and the public. The purpose and values of the Nutritional Therapy Association guide this Code of Ethics.

- NTA professionals will participate in activities that improve the nutritional well-being of the client and the community.
- NTA professionals will strive continually to improve skill and knowledge, and make their professional attainments available to their clients and colleagues.
- An NTA professional's services or protocols will be founded on a legal and practical basis. Practitioners will strive to work with others who uphold the highest letter of the law for our profession.
- An NTA professional will not exceed their scope of service or practice, either in abilities or by law.
- An NTA professional will choose whom he or she will serve. Having undertaken a client, however, they may not neglect the client unless discharged. The member may discontinue service only after giving due notice to the client.
- An NTA professional will seek consultation in doubtful or difficult cases, and whenever it appears that the services of other professionals are warranted to provide more complete or better-quality advice.
- An NTA professional will not reveal the confidences entrusted in the course of consultations, unless required to do so by law. NTA professionals will comply with relevant HIPPA guidelines.
- The professional of the Nutritional Therapy Association will guard the public and themselves against any nutritional counselor deficient in moral character or professional competence. They will obey all laws, uphold the dignity and honor of the profession and accept its self-imposed disciplines. They will oppose without hesitation illegal or unethical conduct of fellow members.
- An NTA professional will hold themselves to the highest level of moral and ethical character when interacting with clients and the public. Harassment or misconduct with clients or other professionals will not be tolerated.
- In pursuit of this code and these goals, an NTA professional will vigorously defend our first amendment right of freedom of speech and press to impart truthful information concerning diet and nutrition, and will defend the health freedom right of the public to obtain such data from the sources that they may choose.

Photo Release Consent

During the course of your workshops or other NTA events, your photograph may be taken for future promotional use in print, online, or other public arenas. These photos may be used with or without names and can be utilized for any lawful purpose, including such purposes as publicity, illustration, advertising, and web content.

If you **do not** consent to have photographs of you used by the NTA for any of these purposes, **you must provide written notice to the NTA office** at info@ntaaustralia.com.au . If we receive this written notice, any image that you appear in will not be used in any of our materials.

Privacy of Personal Information

The NTA collects your personal information, including your email, mailing address, and phone number in order to ensure you receive all necessary information about the course you enroll in as well as important communications from your instructors and the NTA support staff, and critical documentation such as your certificate of completion and details on how to maintain your credentials.

We respect the privacy of this information and do not sell it to third parties. However, we do maintain the right to share needed information with vetted and respected organizations that have direct interaction and impact on your learning experience in the classroom. You may receive emails directly from these organizations when necessary for account creation and verification.

By registering for a course with the NTA, you consent to have your personal information shared with these select organizations as they support your growth and development during the program and provide an important resource when you enter the industry. You always have the choice to unsubscribe to the communications you receive from these partners.

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Student Contract

CERTIFICATION CRITERIA

We recommend that you budget an average of 25 hours per week for coursework and study, but actual hours will vary depending on your learning style, reading speed, etc. To complete one of the NTA's Nutritional Therapy Training Programs, students are required to complete the following certification criteria:

- Follow the course syllabus, meet required homework deadlines, and successfully pass required assignments.
- Submit assignments through the NTA's online learning management system and adhere to its terms of use.
- Successfully review and complete all curriculum materials including required reading, video lectures, video conference calls, and required audio lectures.
- Receive a Proficient grade on all assignments.
- Attend all 3 mandatory workshops and complete all practical based clinical assignments
- Meet the homework benchmarks to sit for exams and advance to each new term.
- Pass all written examinations throughout the course.
- Produce original work for projects and assignments. The NTA has a zero-plagiarism policy.
- Adhere to all criteria, agreements, and policies outlined in this handbook.

TECHNICAL REQUIREMENTS

Students in the FNTP program will use the NTA's online learning management system (LMS) to:

- Access course content, lectures, and reference materials
- Complete quizzes and upload homework
- Monitor progress
- Connect with instructors/classmates and engage in discussions
- Read announcements
- Provide feedback
- And much more!

Technical Requirements: To successfully complete the coursework, FNTP students will need to have a desktop or laptop computer equipped with a web camera, microphone (can be internal), Microsoft Word or compatible word processing software, and high-speed internet access.

To use our LMS on your computer, you will need to have:

- A high-speed internet connection
- The latest version of Chrome or Safari
- Word processing software
- A web camera for Zoom call participation

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MANDATORY WORKSHOPS

To be certified, Functional Nutritional Therapy Practitioner students are required to participate in workshops. These workshops are designed to provide students with a supportive environment to learn the Functional Clinical Assessment, client interview process, and the clinical skills necessary to practice.. Workshop's are now offered in a hybrid format, to respect each individual's right to health privacy and their own unique needs. See page 3 for the workshop format options.

In order to provide a safe and effective educational environment for all participants, students are expected to:

- Attend all three workshops. FNTP students are allowed to miss only one eight-hour day as an excused absence with permission from the Lead Instructor. If critical instruction or exam time is missed as a result of this absence, the student is responsible for making up the missed learning, which may involve private tutoring with a qualified Course Mentor.
- Come prepared for the workshops, bringing the necessary equipment and having reviewed the appropriate lectures.
- Use only professional grade nutrient test kits to ensure ingredient safety.
- Have your workshop and practice partners complete the Nutritional Therapy Informed Consent and Disclaimer prior to initiating the client consultation process.
- Follow the Functional Nutritional Therapy Practitioner scope of practice as described in the Nutritional Therapy Informed Consent and Disclaimer document.
- Always ask and obtain permission to touch. If a practice partner or client is hesitant, offer to guide their own hands to do a palpation. Never try to persuade someone to allow you to touch an area if they are not comfortable with you doing so.
- Always take precaution if your workshop partner has any physiological, psychological, or pharmaceutical considerations. When in doubt, always consult with appropriately trained professionals.
- Take responsibility for their health and personal belongings. Your instructors will be available to provide instruction and supervision for workshops, but students are responsible for their own actions during the classroom related activities. Instructors, Assistant Instructors, Course Mentors, Guest Speakers, and the NTA will not be responsible for any injury, medical or pathological conditions, or lost or damaged personal property that may occur during program related activities in or outside of the classroom, including, but not limited to, damage or loss of personal property, massage tables, test kits, stethoscopes, blood pressure cuffs, etc.
- Keep strictly confidential any information obtained as part of the Client-Practitioner exercises.
- Not share or sell any personal information collected during class. Some information is strictly for peer to peer contact and is not to be released to outside parties or used for solicitation.

HOMEWORK BENCHMARKS

In order to attend the workshops and sit for the exams, a student must adhere to the following benchmarks. Failure to meet these requirements may result in consequences up to and including removal from the program. For each term, students must:

- Have no more than a total of three outstanding assignments for all modules covered in the term by 11:59 PM AEST on the last day of the term. This excludes Client Consultation assignments, which must all be completed by the end of term. More than three

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outstanding assignments will make you ineligible to progress to the next term, which will impact your ability to complete the program.

- All of the three outstanding assignments from the previous term, must then be completed within the first two weeks of the new term in order to continue with the program.
- Having more than three outstanding, or being unable to complete the assignments in the two week grace period will result in the Academic Team reaching out to you.

Instructors will support students with reminders to track progress in effort reach these benchmarks. Students should also be monitoring their own completion progress throughout the course and strive to complete the coursework in line with the course syllabus.

If you are unable to complete your work by the end of that extension, you will be connected with the Academic Team to be placed on an academic success plan. Failure to complete outstanding work according to the academic success plan terms may result in removal from the program.

EXAMINATION POLICIES & PROCEDURES

To sit for each exam, students must meet the homework benchmark for that term and be complete with the work from previous terms.

If a student fails or misses a written exam, they have two weeks (14 calendar days) from the originally scheduled test date to retake and pass an alternate test. Students must pay for additional proctoring services as needed for retakes. The Lead Instructor will help make arrangements for the FCA portion of the exam as needed.

Students can take the term exams or final exam **a maximum of two times** (original exam and one retake) within the allotted 14-day period. If a student fails to pass after two attempts, they must drop the program and re-enroll. No refund will be issued (per the Cancellation Policy), but eligibility for reduced re-entry is still possible.

HOMEWORK EXTENSION POLICY

If an emergency or extenuating life circumstance prevents a student from completing their outstanding assignments (three maximum) from the final term by the homework deadline as published in the course syllabus outline, it is their responsibility to contact the Lead Instructor to request a homework extension.

If the Lead Instructor approves, the student will be granted a 21-calendar day homework extension, calculated based on the homework deadline date. **The student will need to contact the NTA via email (info@ntaaustralia.com.au) to pay the AUD \$130 Homework Extension Fee** before it becomes official.

This extension is only for those students who have been keeping up with their studies throughout the course but found themselves unable to complete these specific assignments by the deadline.

If a student pays the extension fee but fails to submit their homework within the 21 days, the NTA may consider granting them an additional extension on a case-by-case basis in extreme circumstances. The NTA will charge AUD \$130 for each additional three-week extension to keep the student's LMS account active. The NTA will only grant students **a maximum of three total extensions (a total of 63**

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calendar days). If a student has failed to complete all of their outstanding work by this time, they will not earn their diploma and must re-enroll and complete the entire course again at the full tuition rate. The Lead Instructor will oversee the completion of homework during the period of the homework extension(s).

CODE OF CONDUCT

The NTA works to foster a learning environment that is open and accepting of diverse opinions, experiences, and beliefs. We value the exchange of ideas and knowledge and are committed to ensuring the classroom is a safe space for all students to contribute and participate. Whether engaging in online classroom discussions, conference calls, or workshops, the NTA requires that all students behave professionally, respectfully, and constructively in all interactions. Any student who disrupts the learning environment or creates an unsafe atmosphere physically or emotionally for other students will first be spoken to by the Lead Instructor. If the behavior continues, additional action will be taken by the NTA to preserve the positive learning experience of the class, which could include an NTA Initiated Drop.

PERSONAL HEALTH NEEDS

The Nutritional Therapy Association understands that students choose to enroll in our programs as part of their personal health journeys. However, if a student is unable to finish the class or meet the criteria outlined in the student contract due to a pre-existing medical condition or newly discovered health issue, the NTA must adhere to the cancellation policy, refund terms, and drop policy that all students agree to upon registration. If students choose to re-enroll at a future time, our re-entry policy will be strictly followed.

PREGNANCY POLICY

Pregnancy is a wonderful time of nourishment and change for a woman's body! Students who are pregnant or become pregnant while enrolled in one of NTA's programs should disclose their pregnancy to their Lead Instructor so appropriate adjustments can be made for workshops. As a pregnant student, you will learn to perform the FCA and must pass the practical exam. If you are attending an in person workshop format, you will not have a portion of the FCA performed on your own body. This sacred time needs to be honored and treated with due respect, so we ask that you only participate in the Functional Clinical Assessment during the workshops from the practitioner side throughout your pregnancy journey. Supplements are also part of our curriculum and recommendation process. If you are pregnant, you need to carefully review the list of contraindicated supplements, but it is also critical that you discuss any supplement you wish to use in class with your primary care provider. We also ask that no pregnant practice clients or practice bodies be used at any point during your training.

ADA POLICY

The Nutritional Therapy Association is committed to serving all students and will provide reasonable accommodations to students with disabilities in accordance with our ADA Policy. Students must request accommodations and provide the necessary documentation 6 weeks prior to the start of class. For full policy details, please visit [NutritionalTherapy.com](https://www.NutritionalTherapy.com).

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STUDENT/CLIENT SERVICES POLICY

During your time as a student in an NTA training program, you are not permitted to charge for FNTP consultation services provided, including time spent on the practice client work necessary for the course. As with other professional certification programs, it is unethical to collect compensation for the skills you are still learning and refining as a student. If you wish to resell supplements to your practice clients as a student, it is your responsibility to obtain the proper reseller's permits and to learn and abide by tax laws and policies in your state.

COPYRIGHT & PLAGIARISM POLICY

The curriculum materials presented in and provided for your FNTP education, including but not limited to NTA Student Guides, PowerPoints, and reference handouts, are copyright protected and intended only for use in your personal education journey. If you wish to utilize concepts and information you learned in the program for your future business endeavors, we respectfully ask that you synthesize and summarize the material to create your own original work for your audience. You may reference information you learned in the course, giving the NTA an appropriate reference citation, but direct usage of our course materials is prohibited. If you need a refresher on what and how to cite appropriately, please see the Citation Guidelines handout from the Welcome Module or visit [The Purdue Online Writing Lab](#) to learn more about APA citations.

Likewise, when you are a student of the NTA program, it is expected that the work you submit for assignments and projects is your original material and any source you utilize should be cited appropriately. Instructors will monitor submissions for signs of plagiarism and students will be required to resubmit original work for a first offense. If a student submits plagiarized work more than once, consequences may ensue up to and including expulsion from the program. For a detailed definition and deeper understanding of plagiarism, read "Plagiarism: Why is it such a big issue for medical writers?"^[1], which you can access through the PubMed database [here](#).

ANTI-HARASSMENT POLICY

The Nutritional Therapy Association, Inc. prohibits any and all types of harassment, sexual harassment, or discrimination of its Instructors, Students, Course Mentors or Staff by other Instructors, Students, Course Mentors, Staff, or outside parties. Harassment or discrimination based on race, color, religion, age, sex, sexual orientation, pregnancy, marital status, national origin, disability, veteran status, or other protected status, negatively affects morale, motivation, and job performance. It is inappropriate, offensive, and will not be tolerated. Any instructor, student, course mentor or staff member who is aware of any instances of harassment, sexual harassment, or discrimination and is not comfortable addressing the concern with the individuals involved should report the alleged act immediately to the Director of Education or the Executive Director of the NTA. If the Instructor, Student, Course Mentor or Staff is uncomfortable discussing the matter with the NTA staff, they should report the alleged act immediately to any member of the Board of Directors of the Nutritional Therapy Association, Inc.

^[1] Das, N., & Panjabi, M. (2011). Plagiarism: Why is it such a big issue for medical writers?. Perspectives in clinical research, 2(2), 67-71.

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CLASSROOM & WORKPLACE SEXUAL HARASSMENT & MISCONDUCT POLICY

The Nutritional Therapy Association is committed to maintaining a safe and healthy educational and work environment in which no member of the NTA community is, on the basis of sex, sexual orientation, or gender identity, excluded from participation in, denied the benefits of, or subjected to discrimination in any NTA program or activity. Gender-based and sexual harassment, including sexual violence, are forms of sex discrimination in that they deny or limit an individual's ability to participate in or benefit from NTA programs or activities.

This policy is designed to ensure a safe and non-discriminatory educational and workplace environment and to meet legal requirements, including: Title IX of the Education Amendments of 1972, which prohibits discrimination on the basis of sex in the school's programs or activities; relevant sections of the Violence Against Women Reauthorization Act; Title VII of the Civil Rights Act of 1964, which prohibits discrimination on the basis of sex in employment; and Washington State or national laws that prohibit discrimination on the basis of sex, sexual orientation, and gender identity.

It does not preclude application or enforcement of other NTA policies. It is the policy of the school to encourage reporting of incidents; to prevent incidents of sexual and gender-based harassment from denying or limiting an individual's ability to participate in or benefit from the NTA's programs; to make available timely services for those who have been affected by discrimination; and to provide prompt and equitable methods of investigation and resolution to stop discrimination, remedy any harm, and prevent its recurrence.

Violations of this policy may result in the imposition of sanctions up to and including termination, dismissal, or expulsion, as determined by the appropriate officials at the NTA.

Retaliation against an individual for raising an allegation of sexual or gender-based harassment, for cooperating in an investigation of such a complaint, or for opposing discriminatory practices is prohibited.

Submitting a complaint that is not in good faith or providing false or misleading information in any investigation of complaints is also prohibited.

DEFINITIONS

Sexual Harassment

Sexual harassment is unwelcome conduct of a sexual nature, including unwelcome sexual advances, requests for sexual favors, and other verbal, nonverbal, graphic, or physical conduct of a sexual nature, when: (1) submission to or rejection of such conduct is made either explicitly or implicitly a condition of an individual's employment or academic standing or is used as the basis for employment decisions or for academic evaluation, grades, or advancement (*quid pro quo*); or, (2) such conduct is sufficiently severe, persistent, or pervasive that it interferes with or limits a person's ability to participate in or benefit from the NTA's educational or workplace programs or activities (*hostile environment*).

Quid pro quo sexual harassment can occur whether a person resists and suffers the threatened harm, or the person submits and avoids the threatened harm. Both situations could constitute discrimination on the basis of sex.

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A hostile environment can be created by persistent or pervasive conduct or by a single severe episode. The more severe the conduct, the less need there is to show a repetitive series of incidents to prove a hostile environment. Sexual violence, including rape, sexual assault, and domestic and dating violence, is a form of sexual harassment.

In addition, the following conduct may violate this policy:

- Observing, photographing, videotaping, or making other visual or auditory records of sexual activity or nudity, where there is a reasonable expectation of privacy, without the knowledge and consent of all parties
- Sharing visual or auditory records of sexual activity or nudity without the knowledge and consent of all recorded parties and recipient(s)
- Sexual advances, whether or not they involve physical touching
- Commenting about or inappropriately touching an individual's body
- Requests for sexual favors in exchange for actual or promised job benefits, such as favorable reviews, salary increases, promotions, increased benefits, or continued employment
- Lewd or sexually suggestive comments, jokes, innuendoes, or gestures
- Stalking
- Other verbal, nonverbal, graphic, or physical conduct may create a hostile environment if the conduct is sufficiently persistent, pervasive, or severe to deny a person equal access to the NTA's programs or activities

Whether the conduct creates a hostile environment may depend on a variety of factors, including: the degree to which the conduct affected one or more person's education or employment; the type, frequency, and duration of the conduct; the relationship between the parties; the number of people involved; and the context in which the conduct occurred.

Unwelcome Conduct

Conduct is unwelcome if a person (1) did not request or invite it and (2) regarded the unrequested or uninvited conduct as undesirable or offensive. That a person welcomes some sexual contact does not necessarily mean that person welcomes other sexual contact. Similarly, that a person willingly participates in conduct on one occasion does not necessarily mean that the same conduct is welcome on a subsequent occasion. Whether conduct is unwelcome is determined based on the totality of the circumstances, including various objective and subjective factors.

The following types of information may be helpful in making that determination:

Statements by any witnesses to the alleged incident; information about the relative credibility of the parties and witnesses; the detail and consistency of each person's account; the absence of corroborating information where it should logically exist; information that the Respondent has been found to have harassed others; information that the Complainant has been found to have made false allegations against others; information about the Complainant's reaction or behavior after the alleged incident; and information about any actions the parties took immediately following the incident, including reporting the matter to others.

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In addition, when a person is so impaired or incapacitated as to be incapable of requesting or inviting the conduct, conduct of a sexual nature is deemed unwelcome, provided that the Respondent knew or reasonably should have known of the person's impairment or incapacity.

The person may be impaired or incapacitated as a result of drugs or alcohol or for some other reason, such as sleep or unconsciousness. A Respondent's impairment at the time of the incident as a result of drugs or alcohol does not, however, diminish the Respondent's responsibility for sexual or gender-based harassment under this policy.

Gender-Based Harassment

Gender-based harassment is verbal, nonverbal, graphic, or physical aggression, intimidation, or hostile conduct based on sex, sex-stereotyping, sexual orientation or gender identity, but not involving conduct of a sexual nature, when such conduct is sufficiently severe, persistent, or pervasive that it interferes with or limits a person's ability to participate in or benefit from the NTA's educational or workplace programs or activities. For example, persistent disparagement of a person based on a perceived lack of stereotypical masculinity or femininity or exclusion from an activity based on sexual orientation or gender identity also may violate this policy.

Student - Instructor Relations

As the NTA strives to provide the safest and most accepting classroom environment for our students, relationships between a staff member or instructor and a student or course mentor of a sexual or romantic nature are prohibited. An exception is made if a spouse or partner of an instructor or staff member enrolls in a course as a student.

Reporting and Investigation

The NTA takes concerns about discrimination, harassment and sexual misconduct seriously. We encourage employees, students and alumnus to raise any concerns they may have through the proper channels so that these concerns can be evaluated, investigated and resolved. Any NTA staff, faculty or alumnus who wishes to report a concern about harassment, discrimination or retaliation is encouraged to report these concerns immediately.

NTA staff or faculty members may do so by contacting Red Flag Reporting at www.RedFlagReporting.com or 77-647-3335 (ID 3604930900). Red Flag Reporting is a team of Human Resource experts who handle all reports 24/7 either by phone or online, safely and securely.

Both current NTA students and NTA alumnus may raise their concerns by contacting the Academic Leadership team at academics@nutritionaltherapy.com.

NTA will take steps to evaluate, investigate and resolve complaints promptly and on a confidential basis to the maximum extent possible. NTA also prohibits retaliation against employees, students and alumnus who bring forth complaints or concerns about conduct they reasonably believe to be discrimination, harassment or sexual misconduct. Concerns about retaliation against a complainant should also be brought to the attention of NTA through the contacts listed above.

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NTA may address complaints of harassment, discrimination or sexual misconduct through appropriate corrective action, up to and including termination of employment or non-renewal of enrollment or certification.

For additional information about the NTA policies and procedures, students and graduates may consult the Academic Leadership team (academics@nutritionaltherapy.com).

WHISTLEBLOWER POLICY

A whistleblower as defined by this policy is a student, employee or alumnus who reports an activity that they consider to be illegal, dishonest or harassment to a student or employee. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; Human Resources will conduct a thorough review.

If a student or employee has knowledge of or a concern of illegal, dishonest behavior or harassment the employee is to contact the Director of Education or the Human Resources Manager. The student or employee must exercise sound judgment to avoid baseless allegations. A student or employee who intentionally files a false report of wrongdoing will be subject to discipline, up to and including expulsion or termination.

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. The NTA will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes they are being retaliated against must contact the Human Resources Director immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

DRUG & ALCOHOL POLICY

The NTA expects all students to be fully present and ready to participate effectively at the workshop weekends. Workshops are an extension of the NTA classroom and appropriate, professional, academic behavior is expected at all times. The use or possession of recreational drugs, alcohol, or other chemical substances is strictly prohibited as they impair the ability to safely conduct a Functional Clinical Assessment and cause disruption to the workshop. Misuse of prescription drugs is also prohibited. Any student found to be in possession or under the influence of drugs or alcohol, or, who misuse prescription drugs during a workshop will be removed from the program through an NTA Initiated Drop and will issued a refund based on the cancellation policy as signed at the time of registration.

INCLEMENT WEATHER POLICY

In the event of an inclement weather situation that impacts a student's ability to attend a workshop weekend, reasonable accommodation will be made by the NTA to ensure the student's safety.

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If a student is facing weather related travel difficulties, they must contact their Lead Instructor immediately so arrangements can be made. If the Lead Instructor and Director of Education confirm the weather is severe enough to warrant an excused absence, the student will be given alternative assignments that can be completed virtually to make up the missed seat hours. The NTA Office will arrange a similar alternative set of assignments should inclement weather cause the workshop weekend to be delayed or cancelled for all students. The student will be responsible for arranging a proctor for any exams or FCA training that needs to be made up, which may involve a proctoring fee.

TRAVEL COSTS & RESTRICTIONS

We cannot guarantee that changes will not occur in the future that may prevent travel or small groups gathering for workshops. It is therefore highly recommended you organize a back up plan with friends or family members as practice bodies and that you clarify when booking flights or accommodation what the refund or credit arrangements will be. If traveling to attend a workshop please plan to attend from 9am to 6pm each day, and arrange flights accordingly. The NTA is not responsible for any costs of travel to workshops that are non-refundable to the student.

USE OF OTHER MODALITIES

During the workshop weekends, some students may be excited to demonstrate other modalities in the classroom (e.g. pendulums, Contact Reflex Analysis, Applied Kinesiology, NRG Foot Baths, etc.). While the NTA appreciates the diverse experiences and training our students bring to class, these types of modalities are outside of the scope of the NTA's training programs and will not be permitted in class.

Class Transfer Policy

Class transfers are designed for students who wish to transfer into the next term of another classroom in the same class year and continue with their studies. Transferring is only permitted into the next class cycle so that students can give themselves slightly more breathing space but still continue the momentum of the course content.

Class transfers incur a \$500.00 AUD transfer fee and only one class transfer per student enrollment is allowed and must occur within the same curriculum year. To transfer to the next class cycle, you must complete a full term in your original class to have the grade book transferred. Inability to complete the end of the term, will require all assignments for that term to be resubmitted in the new classroom. The NTA Drop Policy terms apply to all class transfer students also, see policy on page 18.

Students who wish to suspend their training must defer which involves dropping from the current class and applying for re-entry to another class cycle within the calendar year. When you drop and re-enroll you are disconnected from the learning platform until closer to the next class you wish to re-enroll is about to open. Re-entry is only available to students after the 90 day cancellation period has passed. The cost of a Reduced Re-entry enrollments which incur a fee of \$4950.00 AUD. Please see the Re-Entry Policy [here](#).

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Drop Policy

DROPPING FROM AN NTA PROGRAM

If a student decides to drop an NTA program, they must follow the Student Initiated Drop Process outlined below. Failure to comply with this process will result in an NTA Initiated Drop and the student will lose reduced re-entry eligibility.

STUDENT INITIATED DROP PROCESS

Students who find themselves unable to complete their program for any reason (and have no desire to re-enroll) must complete the following steps:

1. Contact your Lead Instructor and discuss your situation. If you determine that dropping the program is your best solution, let your instructor team know your decision is final.
2. Save any work you have submitted to the online classroom environment and finish downloading any course materials you may need in the future as you will be disconnected from the classroom portal 48 hours after submitting your written drop notice. **NTA does not save your work.**
3. **Provide written notice** to the NTA AU/NZ Program Director declaring your need to drop the program. Email this notice to info@ntaaustralia.com.au. If you are eligible for a refund (per the cancellation policy) and wish to claim it, or, if you qualify and desire to use the reduced re-entry option (see more on the next page), please outline those details within your written notice.
4. Upon receipt of this written notice, NTA will confirm your refund or reduced re-entry status if necessary and will officially process your drop request.

NTA INITIATED DROP

The NTA can initiate an automatic drop of a student from the program under the following circumstances:

1. A student does not attend a workshop weekend (excluding any approved arrangements with the Lead Instructor and NTA office).
2. A student does not meet the homework benchmarks and does not obtain special approval from the Lead Instructor for an exemption.
3. A student does not login to the LMS or complete any work for 3 months with no response to contact from the NTA.
4. A student fails to provide written notice of dropping the program as outlined above. Your drop is not official without written notice (email is acceptable).
5. A student breaches any section of the student contract and/or violates any code of conduct policy.

In the event of an NTA Initiated Drop, refunds will be issued based on the Cancellation Policy, but potential for reduced re-entry is forfeited. The student will be immediately disconnected from the online classroom and will be issued written notice of these actions from the NTA.

Re-Entry Policy

REDUCED RE-ENTRY FEES

If a student decides to drop an NTA program, they may re-enter a class at a reduced re-entry fee rate if they were in compliance with the *Student Contract* at the time of the drop and elect to waive any refund they are eligible for. Drops initiated by the NTA are eligible for re-entry, but such students must pay the full current tuition price. **The reduced re-entry fee is AUD\$4,490.** Reduced re-entry may only be used one time and must be used within **three class cycles from the date of the drop.** If a student does not complete the course a second time, they will not be granted reduced re-entry again. Please understand that this reduced re-entry fee is NTA's effort to show grace and compassion for the unexpected circumstances that life can present. This fee cannot be waived or reduced as it is already set significantly below the actual cost the NTA incurs to provide this education to each student.

Eligible students who wish to take advantage of the reduced re-entry fee rate **must indicate their desire to do so in the written notice** submitted to the NTA AU/NZ Program Director when dropping the course. Students should declare their desire to use the reduced re-entry option as well as state the class in which they intend to re-enroll within the next three course cycles. Please note that you will not be locked into that class selection, but it helps us to know what you are anticipating as we plan and schedule those future classes. You will not be permitted to jump into another program mid-cycle.

REFUNDS

Students in good standing who drop while the cancellation policy refund dates are still in effect may be given the opportunity to forfeit a refund in order to be eligible for the reduced re-entry price.

Students who choose to receive a refund according to the Cancellation Policy must pay the full current tuition price to re-enroll. Those who opt to forfeit their refund must submit their commitment to do so in writing along with a statement as to which re-entry option they will pursue. This notice can be emailed to the NTA AU/NZ Program Director at info@ntaaustralia.com.au.

RE-ENTRY DEADLINE

Reduced re-entries must take place within three consecutive course sessions from the date of the drop. Students who fail to re-enroll within the specified period still forfeit their original refund and must pay the current full tuition price if they wish to re-enroll at a later date.

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RE-ENTRY WORKSHOPS, ASSIGNMENTS & EXAMS

The NTA allows re-entry students to resubmit previously completed written assignments, but these must be saved outside of the online classroom portal and re-uploaded during the new class. Since the NTA regularly updates curriculum, we require re-entry students to complete the following in the new class:

- Attend all 3 workshop weekend
- Pass all written and practical exams
- Review all mandatory lectures, reference materials, etc. and complete all assignments
- Meet all certification criteria

Student Complaint Disclosure

Washington State law requires private vocational schools to inform students how to file a complaint. By signing the NTA Student Handbook Contract in the registration packet, you acknowledge that you understand the student complaint process and terms.

FIRST STEPS

Before you file a complaint, you should make a good faith effort to resolve the problem by:

- Communicating directly with your instructor or school officials
- Using the school's internal grievance or complaint process
- Bringing your problem to the attention of the school's Executive Director
- Keeping notes of these efforts, as the complaint form will ask you to detail those contacts

WHAT HAPPENS NEXT?

Within 10 days of receiving your complaint, Workforce Board staff will review it and notify you whether they have jurisdiction over your complaint. If not, they may refer your complaint to another state or federal agency. In some cases, you may consider taking your issue to small claims court or civil court. The Workforce Board does not offer legal advice.

IF YOUR COMPLAINT MOVES FORWARD

If the Workforce Board accepts your complaint, they will forward it to the school for a response. The school has 15 working days to either resolve the complaint directly with you or send the agency a written response. After receiving the school's response, the Workforce Board will conduct an investigation and try to reach a negotiated agreement between you and the school. If an agreement is reached, the Workforce Board will confirm the solution in writing and close the matter. If not, they will issue a determination that will be sent to you and the school.

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REFUNDS AND RESTITUTION

If the school is ordered by the Workforce Board to make a refund, pay restitution, or make other arrangements (such as additional class time or placement assistance), the school must document how it has complied. In some cases, the Workforce Board may also take separate disciplinary action against the school.

COMPLAINTS ARE PUBLIC RECORDS

Please be aware that your name, address, and phone number might be disclosed in the event of a public records request. This information can't be used for commercial purposes, however. Contact the Workforce Board at (360) 709-4600 for more information.

NTA Membership

FREE TRIAL MEMBERSHIP

Upon completion of the NTA program, all graduates will receive a complimentary trial membership to the NTA's membership program. There is no obligation to renew once the trial period is complete.

Student Printed Name

Student Signature

Date