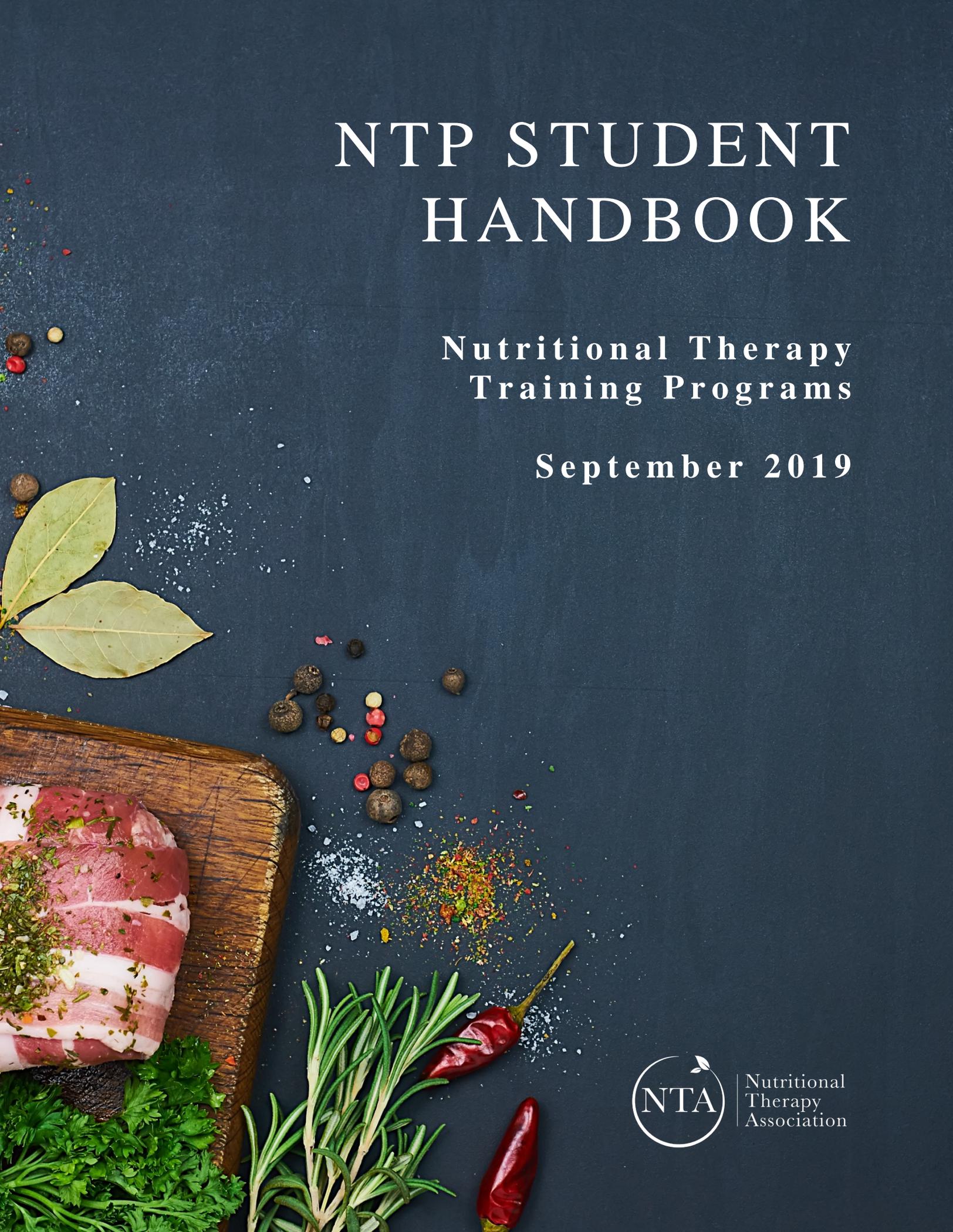


# NTP STUDENT HANDBOOK

Nutritional Therapy  
Training Programs

September 2019



Nutritional  
Therapy  
Association

# NTA STUDENT HANDBOOK

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## Table of Contents

- Welcome letter from NTA’s Founder.....2
- Online/In-Person Course Model.....3
  - Online Coursework
  - Workshops
- Informed Consent and Disclaimer.....4-6
  - Goals of Nutritional Therapy
  - Scope of Practice
  - Licensure
  - Health Concerns
  - Communication
  - Practitioner Code of Ethics
- Photo Release Consent.....7
- Privacy of Personal Information.....7
- Student Contract.....8-16
  - Certification Criteria
  - Technical Requirements
  - Mandatory Workshops
  - Homework Benchmarks
  - Examination Policies and Procedures
  - Homework Extension Policy
  - Code of Conduct
  - Personal Health Needs
  - Pregnancy Policy
  - ADA Policy
  - Student/Client Services Policy
  - Copyright and Plagiarism Policy
  - Anti-Harassment Policy
  - Classroom and Workplace Sexual Harassment and Misconduct Policy
  - Whistleblower Policy
  - Drug and Alcohol Policy
  - Inclement Weather Policy
  - Use of Other Modalities
- Workshop Transfer Policy.....17
- Drop Policy.....18
  - Student Initiated Drop
  - NTA Initiated Drop
- Re-Entry Policy.....19
  - Reduced Re-Entry
  - Refunds
  - Re-Entry Deadlines
  - Re-Entry Workshops, Assignments, and Exams
- Student Complaint Disclosure.....20
- NTA Membership Benefits.....21

# NTP 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 tribe!

Yours in Health,



Gray L. Graham, BA, NTP  
NTA Founder



# NTP STUDENT HANDBOOK

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## Online/In-Person Course Model

### ONLINE COURSEWORK

The majority of the coursework can be completed online and 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 outline to ensure you complete the modules at the appropriate pace to meet the benchmarks for attending workshops and taking exams.

Your instructor will schedule bi-weekly Zoom conference calls that will be held on a designated day/time, but the calls will be recorded. We encourage you to attend the live calls if possible to interact with your classmates and it provides the opportunities to ask real-time questions to your instructor, but you must listen to the recordings if you are unable to participate in the live sessions.

Online assignments include (but are not limited to) book reviews, essay questions, multiple choice quizzes, recipe assignments, journaling activities, diagram assignments, action assignments, Client folders, and a Community Outreach Project.

### WORKSHOPS

The Nutritional Therapy Practitioner program (NTP) requires that students complete three in-person workshop weekends during the academic term to practice interactive clinical evaluation skills and master course content. It is important that students commit the time to attend all workshops at the chosen venue with the same instructor as this provides continuity and builds community. This in-person experience sets NTA's programs 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 network with likeminded individuals, and a chance to ask questions and explore case studies in real time—but you still get to maintain the flexibility of online learning for the remainder of your coursework. Attendance at all workshops is mandatory to qualify for certification. See additional workshop requirements within this Student Handbook.

Please note that as a student in the NTP program, you will be required to perform the hands-on Functional Clinical Assessment (FCA) on other students and have FCA exams performed on you by instructors, assistant instructors, group leaders, and other students (unless pregnancy or health conditions dictate otherwise). This dynamic hands-on assessment tool requires extensive in-person education, which is why NTPs must attend three workshop weekends.

# NTP STUDENT HANDBOOK

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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 NTP.

### GOALS OF 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 Nutritional Therapy Practitioner™ (“NTP”) is a professional certified by the Nutritional Therapy Association, Inc.® NTPs 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 NTP/NTC should be based on evidence-based, scientific information. An NTP/NTC 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 NTP/NTC 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 Nutritional Therapy Association Practitioners:**

The role of an NTP is to provide non-biased health and nutrition information to 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.

NTPs Don't:

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

# NTP STUDENT HANDBOOK

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

## NTPs 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

NTPs are not licensed or certified by any state. The Nutritional Therapy Association, Inc.<sup>®</sup> provides a certificate of completion 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 state to state and occasionally change. **Students and NTPs must research the laws in the state 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 NTP 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 NTP 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 NTP 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, NTPs 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 NTP, sufficiently exercise their body and mind, eat a proper diet, get plenty of rest, learn more about nutrition, and stay in contact with their NTP about

# NTP STUDENT HANDBOOK

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progress and changes. One's healthcare provider is free to contact the NTP 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 in-person 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 [nta@nutritionaltherapy.com](mailto:nta@nutritionaltherapy.com). 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 classroom partner organizations that have direct interaction and impact on your learning experience in the classroom, including (but not limited to) the National Association on Nutrition Professionals (NANP), Biotics Research Corporation, Innate Response, Wise Woman Herbals, Mt. Capra, Modernmeal, and Robowellness (Nutri-Q). These organizations will utilize your information to set-up your needed accounts, but are not permitted to sell or advertise to you unless you opt-in to subscribe to their communications. You may receive emails directly from these organizations when necessary for account creation and verification. The NTA may also occasionally share your contact information with the person you listed as your referrer to the program to facilitate fulfilling their promised promotional offer to you.

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.

# NTP STUDENT HANDBOOK

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## Student Contract

### CERTIFICATION CRITERIA

We recommend that you budget an average of 20 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 passing grade on all Client Folder assignments and the Community Outreach Project.
- Attend all 3 mandatory in-person workshops.
- Meet the homework benchmarks to attend all workshops and sit for exams.
- Pass a written and practical examination for each term.
- 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 NTP program will use Brightspace (the NTA's online learning system) 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!

The system is mobile friendly, and you can access most content on smartphones, tablets, etc. However, it is strongly recommended that you use a laptop or desktop computer to download and organize course files (e.g. required video lectures, client folder forms, reference documents, etc.). File management is possible on mobile devices, but tends to be more cumbersome and time consuming.

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

- A high-speed internet connection
- The latest version of Chrome or Safari
- JavaScript enabled
- Cookies enabled

# NTP STUDENT HANDBOOK

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- Adobe Flash Player 10.1 or newer

## MANDATORY WORKSHOPS

To be certified, Nutritional Therapy Practitioner students are required to participate in hands-on 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 effective nutritional therapy. In order to provide a safe and effective educational environment for all classroom participants, students are expected to:

- Attend all three workshops. NTP 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 Group Leader.
- Come prepared for the workshops, bringing the necessary equipment and having reviewed the appropriate lectures.
- Use only professional grade supplement 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 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, Group Leaders, 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 PST on the Monday prior to the workshop. More than three

# NTP STUDENT HANDBOOK

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outstanding assignments can make you ineligible to sit for the exam and attend your workshop, which will impact your ability to complete the program.

- Have all videos, audios, and required reading for all modules within the term must be complete by 11:59 pm PST on the Monday prior to the workshop. These activities cannot be part of the three outstanding assignments.
- Complete any outstanding assignments by the last day of the term break that follows the workshop. You will not be permitted to begin work on the next term until the work from the previous term is complete.

Instructors will provide progress reports to students two weeks prior to each workshop to help ensure you are on track to 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 outline.

## EXAMINATION POLICIES AND PROCEDURES

To sit for each term 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 and/or practical term exam, they have one month (30 calendar days) from the originally scheduled test date to retake and pass an alternate test. **Students must locate and pay for a qualified proctor.** 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 three times (original exam and two retakes)** within the allotted 30-day period. If a student fails to pass after three 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 third 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 instructor will notify the student, the Student Experience Manager, and the NTA office. **The student will need to contact the NTA via email ([nta@nutritionaltherapy.com](mailto:nta@nutritionaltherapy.com)) to pay the \$75 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 \$75 for each additional three-week extension to keep the student's Brightspace account active. The NTA will only grant students **a maximum of three total extensions (a total of 63 calendar**

# NTP STUDENT HANDBOOK

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**days).** If a student has failed to complete all of their outstanding work by this time, they will not earn their certification 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 in-person 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 the Functional Clinical Assessment portion of the training, pregnant students will act as practitioners only, not as the client. As a pregnant student, you will learn to perform the FCA on fellow students and must pass the practical exam, but you will not have any portion of the FCA performed on your own body. Since your classmates will be refining their abilities through practice, there are chances for error throughout the learning process that a pregnant body should not be subjected to. 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.

## 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).

# NTP STUDENT HANDBOOK

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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 NTP/NTC 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 AND PLAGIARISM POLICY

The curriculum materials presented in and provided for your NTP/NTC 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 Community Outreach Project or 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, Group Leaders, or Staff by other Instructors, Students, Group Leaders, 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, group leader 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, Group Leader 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.

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[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.

# NTP STUDENT HANDBOOK

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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.

# NTP STUDENT HANDBOOK

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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.

# NTP STUDENT HANDBOOK

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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 group leader 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](http://www.RedFlagReporting.com) or 877-647-3335 (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.

Current NTA students may raise their concerns by contacting Mallory Acosta, Student Experience Manager at [mallory@nutritionaltherapy.com](mailto:mallory@nutritionaltherapy.com). NTA alumnus may report concerns to Matt Smith, Chief Executive Officer, at [matt@nutritionaltherapy.com](mailto:matt@nutritionaltherapy.com), or, to Dana Nardi, Chief Community Engagement Officer, [dnardi@nutritionaltherapy.com](mailto:dnardi@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.

# NTP STUDENT HANDBOOK

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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, employees may consult Tyana Owings (tyana@nutritionaltherapy.com). Students may consult Mallory Acosta (mallory@nutritionaltherapy.com), and alumni may consult Matt Smith (matt@nutritionaltherapy.com) or Dana Nardi (dnardi@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 class. 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 an in-person workshop weekend, reasonable accommodation will be made by the NTA to ensure the student's safety.

# NTP STUDENT HANDBOOK

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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.

## 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.

## Workshop Transfer Policy

The community building and relationship formations that take place within the workshop weekends are invaluable components of the NTP program. While we stress the importance of remaining in the same workshop location for all three workshops to increase your connection with your classmates and to allow you to participate in pre-workshop partner activities, NTA understands that there may be emergency circumstances in life that require a student to attend an alternate workshop weekend in another location.

If an enrolled NTP student is absent due to illness or knows in advance that they will be unable to attend a class meeting due to an extreme unavoidable circumstance or medical emergency, they may request to attend another workshop weekend at one of the NTA's other venues to make up the absence. This accommodation is offered on a case-by-case basis with the approval of the NTA. The student will be responsible for all travel and accommodation costs associated with attending the workshop in a new location. To transfer to another workshop location for an excused absence, a student must be in good standing and caught up with their coursework. The following steps should be followed:

1. The student must contact their Lead Instructor and inform them of their inability to attend the scheduled workshop. Please remember this must be an unavoidable emergency or illness—vacations or personal plans do not qualify.
2. The Lead Instructor will contact the Student Experience (SE) Manager to communicate the student's request. The SE Manager will advise the student as to what other venue locations have space available on an alternate weekend. Once the student selects which workshop they can attend, the SE Manager will contact the other venue's Lead Instructor to gain approval.
3. If approval has been granted, the SE Manager will notify the student. **The student must pay a \$150 workshop transfer fee** to the NTA in order to attend the alternate workshop.

The venue selection will be limited to venues that have open seats only and is also **strictly limited to one workshop weekend**. It is the student's responsibility to make sure they have the necessary venue details for the workshop being substituted. They can contact the SE Manager to coordinate the details.

# NTP STUDENT HANDBOOK

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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 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 office declaring your need to drop the program. Email this notice to [nta@nutritionalthrapy.com](mailto:nta@nutritionalthrapy.com). 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 show up for 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 Brightspace 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.

# NTP STUDENT HANDBOOK

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## 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 \$2,200.** 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 office 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 [nta@nutritionaltherapy.com](mailto:nta@nutritionaltherapy.com).

### 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 tuition price if they wish to re-enroll at a later date.

### 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 weekends
- 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.

### 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.

# NTP STUDENT HANDBOOK

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## NTA Membership

### WHAT DOES THE NTA DO?

The Nutritional Therapy Association is a tightly knit community dedicated to empowering individuals, cultivating a tribe, and healing the world. The NTA:

- Offers certification programs in Nutritional Therapy, including the Nutritional Therapy Practitioner™ (NTP) program and the Nutritional Therapy Consultant™ (NTC) program.
- Holds annual and regional conferences to bring together the tribe, provide continuing education, and showcase the brightest minds.
- Provides education, resources, tools, and software to empower Nutritional Therapists and holistic health care professionals.
- Publishes an annual magazine for members, the *Live Nourished Journal*.

### FREE TRIAL MEMBERSHIP

When you register for the NTP class, you also become a member of the Nutritional Therapy Association. As part of your tuition, you get a free trial membership. Please see [NutritionalTherapy.com](http://NutritionalTherapy.com) for details and member benefits.

### MEMBERSHIP DISCLAIMER

NTA membership alone does not entitle you to call yourself a “Nutritional Therapy Practitioner.” To use the NTP credential, you must first complete the training program, receive your certificate, and maintain active professional membership with the NTA by paying your membership dues annually and submitting at least 24 CEUs every two years. Visit [NutritionalTherapy.com](http://NutritionalTherapy.com) for more information about CEU requirements.

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