

# WHEN SHOULD A HOLISTIC NUTRITION PROFESSIONAL REPORT TO AUTHORITIES





Holistic nutrition professionals are unlicensed in all states. During client work, we may suspect abuse, neglect, self-harm, illegal activity, or other concerning behavior.

Despite being unlicensed, we have ethical and, at times, legal obligations to report suspected abuse, neglect, or imminent danger.

Requirements depend on:

- \* The state where the practitioner practices
- \* The laws of the state where our client resides
- \* How our role is defined under state law
- \* The age/vulnerability of the client
- \* Whether the practitioner is acting in a professional capacity (per state law)
- \* Whether there is immediate danger

Because many states do not regulate holistic nutrition, we may not be mandatory reporters, but we have an ethical duty to voluntarily report concerns (“Defer and Refer”).





## > CHILD ABUSE OR NEGLECT

All 50 states require reporting child abuse, but mandated professions differ. Some states only require licensed professionals to report, while others require anyone who suspects abuse to report it.

Examples:

- Florida requires any person who reasonably suspects child abuse/neglect to report it.
- Some states, including California, have long lists of specifically designated mandated reporters.
- Other states have universal reporting laws that apply to everyone, not just professionals.



## > ELDER OR VULNERABLE ADULT ABUSE

Many states also require reporting:

- Elder abuse
- Abuse of disabled adults
- Exploitation
- Self-neglect

Again, requirements vary by state and profession.



## > SELF-HARM OR SUICIDE RISK

This is usually treated differently from abuse reporting laws.

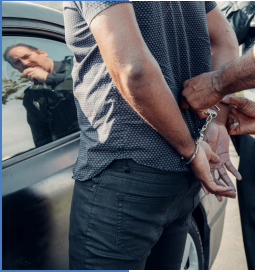
Unlicensed providers generally do not have statutory “duty to warn/protect” obligations like psychologists or therapists.

**However:** Ethically, if a client expresses imminent suicidal intent or a credible threat of violence, contacting emergency services or a crisis resource is appropriate.

A practical distinction:

- Passive thoughts (“sometimes I wish I didn’t wake up”) are different from
- Active imminent risk (“I have a gun and plan to use it tonight”)

**Imminent threats require immediate action.** When thoughts are passive, the practitioner should consider referring the client to a licensed provider.



## > ILLEGAL ACTIVITY

Most crimes are not mandatory-report situations for private professionals.

Generally, you are not required to report ordinary illegal activity disclosed by adult clients.

Exceptions may include:

- Child abuse/exploitation
- Human trafficking
- Threats of serious violence
- Abuse of vulnerable adults

For example, adult drug use disclosed by a client usually does not require mandatory reporting.

## BEST PRACTICES FOR A HOLISTIC NUTRITION PROFESSIONAL

Since Holistic Nutrition Professionals are unlicensed and may work across states, it is safest to create:

1. A written safeguarding policy
2. A reporting protocol
3. Informed consent documents explaining the limits of confidentiality

Your protocol should include:

- When to escalate
- Who to contact
- How to document concerns
- Emergency contacts
- Crisis resources
- When to terminate services and refer out





## RECOMMENDED PRACTICAL FRAMEWORK

Determine your legal status in each state where clients are located.

Important questions:

- Are you working with minors?
- Does the state impose universal reporting?
- Are you employed by an organization with its own reporting duties?

*A healthcare attorney familiar with telehealth and wellness law can clarify responsibilities and review forms.*

Use a “reasonable suspicion” standard. Mandatory reporting laws usually require only reasonable suspicion, not proof. Holistic Nutrition Professionals are not expected to investigate.

Document objectively by keeping factual notes:

- date/time
- exact statements when possible
- observed injuries/behaviors
- actions taken

Avoid speculative language by reporting to the proper agency, such as:

- Child Protective Services
- Adult Protective Services
- local law enforcement
- emergency services for imminent danger

Never promise absolute confidentiality. Even non-licensed wellness professionals should avoid statements like:

- “Everything you tell me stays private, no matter what.”
- Instead, explain that abuse, neglect, or imminent danger may require disclosure to authorities.

## IMPORTANT: RISK-MANAGEMENT

If you provide services remotely across multiple states, the relevant law is often the client's state, not only your own state. Multi-state practice creates additional complexity.



## > USE A STRONG, ORGANIZED APPROACH

Many unlicensed wellness practitioners adopt a policy similar to licensed providers:

- report suspected child/vulnerable adult abuse
- escalate imminent safety threats
- refer mental health crises, such as eating disorders, to licensed providers
- document carefully
- maintain professional boundaries

This usually provides the safest ethical and legal footing, even where reporting is not mandated.

### **Practitioners should also have:**

- a client intake disclaimer and waiver signed by the client
- a safeguarding policy
- a crisis escalation workflow
- a state-by-state reporting resource list for states where you have clients

## **REMEMBER...**

A safe and practical policy is:

- Always report suspected child abuse in good faith
- Always consider the law of the state where your client resides
- Report elder/vulnerable-adult abuse when reasonable concern exists
- Escalate imminent self-harm or violence threats
- Document objectively
- Include limits-of-confidentiality language in intake forms
- Maintain a written safeguarding/reporting protocol

## STATES WITH BROAD REPORTING LAWS

Several states impose reporting obligations on “any person” rather than only designated professionals. Examples include:

- Florida
- New Jersey
- North Carolina

Because laws change, Holistic Nutrition Professionals must verify the requirements for their state and each client's state.

Even in non-universal states, some statutes specifically include:

- healthcare providers
- “healing arts practitioners”
- massage therapists
- counselors
- wellness providers

For example, the following states include “practitioners of the healing arts.”

- Alaska
- Hawaii
- Kansas
- Minnesota
- Virginia

States that specifically include massage therapists as reporters:

- Arkansas
- Iowa
- Nevada
- Ohio

This is important because some holistic nutrition professionals could be interpreted as:

- health practitioners
- alternative health providers
- complementary medicine providers
- or “healing arts” practitioners, depending on state law and how services are marketed

Whether you see clients in person or remotely, and regardless of their state, the safest approach is to **Defer and Refer.**

## NANP Legislative Affairs... Protecting YOUR Right to Practice!

WE ARE HERE FOR YOU!

NANP members can contact Laura Waldo for a one-on-one discussion about the laws in their state.

Laura Waldo, NTP, BCHN®  
NANP Legislative Affairs Specialist

