



**Submission to Australian Government**  
by  
**National Herbalists Association**  
**of Australia**  
Regarding the  
**Private Health Insurance (Accreditation) Rules**

**National Herbalists Association of Australia (NHAA)**

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## Executive Summary

1. This document has been prepared by the National Herbalists Association of Australia (NHAA), which has represented the interests of professional Western Herbal Medicine (WHM) practitioners and Naturopaths in Australia since 1920.
2. The members of the NHAA fall under rule 10(a).
3. The NHAA supports the Draft Private Health Insurance (Accreditation) Rules in principle.
4. As a professional organisation the NHAA believes it should have equal status with the members of Allied Health Professions Australia Ltd, or any successor organisation.
5. The NHAA stands ready to discuss these issues with all parties involved to obtain a suitable resolution.

## Introduction and Background to the National Herbalists Association of Australia

The NHAHA is the key professional Association representing appropriately qualified Western Herbalists and Naturopaths using herbal medicines as their primary treatment modality. It is the oldest professional association of complementary therapists, founded in 1920, with a current full membership of 936 (our total membership is 1461 including student and companion members). This represents approximately one third of practising Herbalists and Naturopaths in Australia. The NHAHA is the only national professional association specifically concerned with the practice and education of Western Herbal Medicine (WHM).

The primary aims of the NHAHA include to:

- Promote, protect and encourage the study, practice and knowledge of medical herbalism.
- Disseminate such knowledge by talks, seminars and publications.
- Encourage the highest ideals of professional and ethical standards.
- Promote herbal medicine within the community as a safe and effective treatment option.

The Full Membership of the Association elects the Board of Directors of the NHAHA, with each member serving a two-year voluntary (unpaid) term after which they may stand for re-election.

Full members of the NHAHA have completed training in Western Herbal Medicine sufficient to meet the educational standards as determined by the Examiners of the Board in consultation with tertiary education institutions (standards based on but exceeding the requirements of the NSW Health Training Package), and must adhere to a comprehensive Code of Ethics and Continuing Professional Education (CPE) program

Since its inception, the NHAHA and its members have been at the forefront of herbal medicine and have been influential in areas ranging from education and practice standards, to government regulation and industry standards. The NHAHA has a strong commitment to achieving high educational standards in herbal medicine practice and supports regulation of the profession.

Membership is mainly practitioners of Western Herbal Medicine including Naturopaths who choose to use herbal medicine as their major modality of practise.

Details of the NHAHA Constitution, the Code of Ethics, Standards for Practice and Course Accreditation Guidelines are available at our website [www.nhaa.org.au](http://www.nhaa.org.au)

## **General Discussion**

The NHAHA is a professional association that fulfils the criteria of rule 10(a).

(i) Member practitioners are required to have a high level of education in their field.

The NHAHA supports the Draft Private Health Insurance (Accreditation) Rules in principle with the following additional comments relating to training and education:

The NHAHA as a professional accreditation body sets a standard that has become the benchmark for herbal training within the Vocational Education & Training (VET) sector. This is evidenced by the direct adoption of the NHAHA's course accreditation system into the Health Training Package (HTP) used as the national standard for training and recognition of Herbalists and Naturopaths. We believe that these standards should be the point of reference for the level of training and education required by all Herbalists and Naturopaths.

(ii) Member practitioners are required to have a regularly updated first Aid qualification.

(iii) Member practitioners are required to carry Professional Indemnity Insurance.

(iv) Member practitioners are required to comply with the NHAHA Code of Conduct and Ethics.

(v) Member practitioners are required to have evidence of on-going professional education/development.

The health insurers treat Herbalists and Naturopaths as allied health professionals and pay a rebate to members based on criteria set out by the health insurers, which includes:

- The practitioner must be eligible for membership of a professional association
- The practitioner must have a first aid qualification
- The practitioner must be covered by professional indemnity insurance
- The practitioner must comply with a code of conduct and ethics
- The practitioner must have on-going professional education/development

The NHAA notes that the professions of Herbalist and Naturopath are not nominated in regulation 3A of the *Health Insurance Regulations 1975*. This is a concern to the NHAA as we believe it is possible that health insurers may delete benefits to their members for services provided by these professions.

Given the fact that NHAA members are deemed to be providers under the current rules, the NHAA believes Regulation 3A should be changed to reflect the practices of Health Insurers and include Herbalists and Naturopaths in the list of allied health professionals. This will ensure that the status quo is maintained and health insurance fund members will not be inconvenienced or find themselves out of pocket.

**The NHAA stands ready to discuss these issues with all parties involved to obtain a suitable resolution.**