HERBALIST & NATURAL PRODUCTS PRACTITIONER SUPPLEMENTAL

For clinical and community herbalists, traditional Chinese and Western herbal practitioners, herb shops that blend to order, and practitioners who make and sell their own herbal and natural products. Supplement manufacturers use CWCO-SUP-DSUP or CWCO-SUP-NUTRA; Ayurvedic centers use CWCO-SUP-AYURVEDA; naturopaths use CWCO-SUP-NATUROPATH. Complete with ACORD 125/126. Attach a product list with labels, the supplier list, any herb identity or contaminant testing, the client intake form, and five years of loss runs.

1 APPLICANT / BUSINESS INFORMATION

LEGAL BUSINESS NAME	DBA	FEIN	YEARS IN BUSINESS

BUSINESS ADDRESS	CITY / STATE / ZIP	WEBSITE

Entity type:
☐ Sole proprietor ☐ Partnership ☐ LLC ☐ Corporation ☐ Nonprofit

PRIMARY CONTACT / TITLE	PHONE	EMAIL

TRAINING / CREDENTIAL (RH, DIPL. CH, LAC, OTHER)	OTHER LICENSES HELD

2 OPERATIONS

DESCRIBE THE HERBAL PRACTICE, THE PRODUCTS MADE OR SOLD, AND HOW CLIENTS RECEIVE THEM

Activities (check all that apply):
☐ One-on-one consultations ☐ Custom formulas for individual clients ☐ Ready-made products for sale ☐ Wholesale to other stores or practitioners
☐ Online store ☐ Farmers markets or events ☐ Wild harvesting / growing herbs ☐ Teaching classes

PRODUCT TYPE	% OF SALES	MADE BY (SELF / CONTRACT / BOUGHT FINISHED)

Product types: tinctures and extracts; teas and bulk herbs; capsules or powders; salves, oils, and balms; granules or raw Chinese herbs; syrups and edibles; pet products.

Volume (last 12 months):
☐ Client consultations ☐ Products (SKUs) sold ☐ Units sold ☐ States shipped to

3 EXPOSURE & RISK QUESTIONS — MAKING, LABELING & SELLING PRODUCTS

FDA declined to exempt herbalists from the supplement manufacturing rule. It uses discretion for formulas made in one-on-one consultations, but intends to enforce against batches sold without consultation.

3-1 Are products made in batches and sold to people the applicant has not consulted? ☐ Yes ☐ No
IF YES, EXPLAIN

3-2 If yes to 3-1, does production follow written cGMP procedures (21 CFR 111)? ☐ Yes ☐ No
IF NO, EXPLAIN

3-3 Is the identity of each incoming herb confirmed by testing or a supplier certificate? ☐ Yes ☐ No
IF NO, EXPLAIN

3-4 Are herbs tested for heavy metals, pesticides, or microbes? ☐ Yes ☐ No
IF NO, EXPLAIN

This supplemental is an intake document. It does not replace any carrier application and affords no coverage.

3-5 Are products made in a home kitchen? ☐ Yes ☐ No
IF YES, EXPLAIN

3-6 Does every label list ingredients, directions, and warnings? ☐ Yes ☐ No
IF NO, EXPLAIN

3-7 Do any labels, websites, or social posts say a product treats or cures a disease? ☐ Yes ☐ No
IF YES, EXPLAIN

3-8 Can each product be traced to its batch and ingredient lots? ☐ Yes ☐ No
IF NO, EXPLAIN

3-9 Are any products sold under another company's brand (private label)? ☐ Yes ☐ No
IF YES, EXPLAIN

3-10 Are any products made by a contract manufacturer? ☐ Yes ☐ No
IF YES, EXPLAIN

3-11 If yes to 3-10, does the contract manufacturer name the applicant as additional insured? ☐ Yes ☐ No
IF NO, EXPLAIN

4 EXPOSURE & RISK QUESTIONS — TOXIC HERBS, DOSING & INTERACTIONS

A San Francisco woman died in 2017 after drinking a tea blended at an herb shop that tested positive for aconite, which has no antidote. A Hong Kong herbalist once prescribed ten times the intended dose of the same herb.

4-1 Are aconite (fu zi, chuan wu, cao wu) or other herbs with narrow safety margins dispensed? ☐ Yes ☐ No
IF YES, EXPLAIN

4-2 If yes to 4-1, is each dispensed amount double-checked against the written formula? ☐ Yes ☐ No
IF NO, EXPLAIN

4-3 Are raw herbs that need special processing sold for clients to prepare at home? ☐ Yes ☐ No
IF YES, EXPLAIN

4-4 Are written preparation and dosing instructions given with every formula? ☐ Yes ☐ No
IF NO, EXPLAIN

4-5 Are clients asked about prescription drugs before a formula is given? ☐ Yes ☐ No
IF NO, EXPLAIN

4-6 Are pregnant or breastfeeding clients screened before receiving herbs? ☐ Yes ☐ No
IF NO, EXPLAIN

4-7 Are herbs or formulas given to children? ☐ Yes ☐ No
IF YES, EXPLAIN

4-8 Are any herbs imported directly from outside the U.S.? ☐ Yes ☐ No
IF YES, EXPLAIN

4-9 Is there a written procedure for recalls and reported adverse reactions? ☐ Yes ☐ No
IF NO, EXPLAIN

5 PAYROLL, SALES & REVENUE

ANNUAL GROSS REVENUE ($)	CONSULTATION REVENUE ($)	PRODUCT SALES ($)	TOTAL ANNUAL PAYROLL ($)

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6 PRIOR INSURANCE & LOSS HISTORY

Attach currently valued loss runs for the last 5 years.

PROFESSIONAL / GL CARRIER	PRODUCTS LIABILITY LIMIT	PRODUCT RECALL LIMIT

DATE OF LOSS	DESCRIPTION	TOTAL INCURRED ($)	OPEN / CLOSED

6-1 Has a client reported a serious reaction to a product or formula? ☐ Yes ☐ No
IF YES, EXPLAIN

6-2 Has FDA or a state agency inspected the applicant, sent a warning letter, or ordered a recall? ☐ Yes ☐ No
IF YES, EXPLAIN

6-3 Has any carrier declined, cancelled, or non-renewed coverage for this operation in the past 5 years? ☐ Yes ☐ No
IF YES, EXPLAIN

6-4 Is the applicant aware of any incident or circumstance that could give rise to a claim? ☐ Yes ☐ No
IF YES, EXPLAIN

7 RISK MANAGEMENT & SAFETY

7-1 Are batch records kept for every product made? ☐ Yes ☐ No
IF NO, EXPLAIN

7-2 Are retained samples kept from each batch? ☐ Yes ☐ No
IF NO, EXPLAIN

7-3 Are wholesale buyers required to carry their own products liability insurance? ☐ Yes ☐ No
IF NO, EXPLAIN

8 SIGNATURE & FRAUD WARNING

The undersigned declares that the statements and answers given in this supplemental are true, complete and correct to the best of their knowledge, and that no material fact has been withheld or misstated. The applicant agrees that this supplemental, together with all ACORD applications and attachments, forms the basis of any submission to insurers and may be relied upon by them. Signing this supplemental does not bind coverage. This supplemental is an intake document prepared by Cory Washington & Co. LLC to support carrier submission; it does not itself provide coverage.

FRAUD NOTICE: Any person who knowingly and with intent to defraud any insurance company or other person files an application for insurance containing any materially false information, or conceals for the purpose of misleading information concerning any fact material thereto, may be committing a fraudulent insurance act, which is a crime and may subject such person to criminal and civil penalties. State-specific fraud warnings appear on the insurer's application.

APPLICANT / AUTHORIZED SIGNATURE (TYPE FULL NAME)	TITLE	DATE

PRODUCER — CORY WASHINGTON & CO. LLC	PRODUCER SIGNATURE (TYPE FULL NAME)	DATE