

## **Grievance and Disciplinary Actions Policy & Procedure**

The Grant Professional Certification Institute (GPCI) is dedicated to strengthening the nonprofit sector's ability to pursue and maintain public and private sector funding by measuring and promoting competency and ethical practices within the field of grantsmanship (the GPCI mission). GPCI accomplishes this mission through the identification of grant professionals who display outstanding expertise and ethical practices. GPCI envisions excellence and accountability in grantsmanship. It seeks to support a philanthropic community assured of grant professionals who can successfully guide and shape the outcomes of their funding endeavors. In addition, the agency was developed to help advance the evolution of the field of grantsmanship as a recognized profession. As the grants field emerges as a profession, validation and accountability will continue to increase in importance. As part of this movement, certification has become an invaluable goal for the field. Among others, GPCI embraces the values of:

- **Accountability** – We recognize and accept the responsibility to sustain, promote, grow and infuse certification into our field. To this end, we will strive to keep the organization financially sound and its certification process available to all who seek to be certified.
- **Psychometric Integrity** – We ensure that GPCI testing products are developed within only the highest standards of validity, reliability and legal defensibility.
- **Delivery of Certification** – We value the broad range of ways in which certification may be delivered to candidates: paper and pencil, online and face-to-face. We will consider the diversity of potential applicants in the creation of certification programs.
- **Challenging the Status Quo** – We seek to move the field of grantsmanship forward by challenging long-held assumptions, building new partnerships with all stakeholders and encouraging innovation and creativity.
- **Strong Ethical Standards** – We seek to maintain only the highest of ethical standards, encouraging ourselves and those around us to act with integrity, fairness and a sense of respect for the responsibilities associated with the oversight of certification.
- **Service to the Field's Constituents** – We seek to always keep the beneficiaries of philanthropy, education, government and other constituents “forward and center” as we make decisions that affect our field.
- **Social Justice** – We seek to treat all people with respect and equality.
- **Diversity** – We recognize that people have different cultural, linguistic, social, class and ethnic backgrounds. Each of us is enriched by the lives and experience of others. We will actively seek input, counsel and involvement from communities of color, the disabled community and from stakeholders who are under-represented in our field.
- **Cultural Sensitivity** – We will demonstrate appreciation for others through active listening and respect for one another's values and norms. We will keep our minds open to new perspectives and challenge our own thinking.
- **Life-Long Learning** – We encourage our community to hone its craft through life-long learning.
- **Service to our Community** – We recognize the importance of giving back to the community through service, pro bono work and other acts that strengthen the world around us.

- Collaboration – We recognize the key to creating change is identifying our partners in the process and engaging in collaboration.

**Strong Ethical Standards:** While all of GPCI’s values play an integral part in the creation of excellence and accountability in grantsmanship, it is the core value of strong ethical standards that is addressed here. Because grant development, grant funding and/or grant management are dynamic and rapidly changing fields, individuals are awarded GPC certification for a period of three (3) years.

Those individuals who are Grant Professional Certified (referred to as “GPCs”) have successfully completed the required certification process, which includes meeting certain education, performance and service criteria, passing a written examination testing a core set of competencies and verifying professional experience. Individuals granted a GPC by GPCI agrees to uphold the ethical standards of the Grant Professionals Association (GPA).

Successful GPCs are granted certification status by GPCI and may hold themselves to the public as a certified grant professional. To maintain and enhance the credibility of GPC and in furtherance of GPCI’s mission, the agency has adopted the following procedures to allow consumers and others to file complaints regarding potential misconduct by a GPC. GPCI also may take action on its own in the event that it learns of possible misconduct by GPCs. Additionally, if GPCI is informed that the Grant Professionals Association’s Ethics Committee has taken or is taking action against a GPC for unethical or criminal actions, GPCI also will take action against the GPC. In the event of a violation of the Grant Professional Association’s Code of Ethics and Standards of Professional Practice or other substantive requirements of the certification process by a GPC, GPCI may reprimand or suspend the GPC, or it may permanently revoke the GPC credential.

GPCI shall ensure that results or sanctions, if taken by GPCI, concerning the Grievance and Disciplinary of a GPC shall be available to all consumers and the public. These procedures shall apply to all complaints or inquiries received about a GPC.

Actions taken under the Grievance and Disciplinary Actions procedure do not constitute enforcement of law, although referral to appropriate federal, state, and local government agencies may be made about a GPC’s conduct in appropriate situations. Individuals bringing a complaint are not entitled to any relief or damage by virtue of this process, although they shall receive notice of the action taken.

All GPCs must agree to abide by the Grant Professionals Association’s Code of Ethics and Standards of Professional Practice (Code of Ethics). If a complaint concerning a GPA member who also is a GPC is brought forward, the complainant will be directed to file a complaint with the GPA Ethics Committee. GPCI will have the option to use the investigation conducted by the GPA Ethics Committee or to conduct their own investigation. The GPCI board will request the GPA Committee make a recommendation as to an appropriate sanction for any GPC compliant reviewed, but will retain the right and duty to review the facts and determine the best action for

GPCI and the GPC credential's integrity. GPCI will review the recommendation and issues presented by the GPA Committee and/or the GPCI review committee and will vote on accepting, add to or creating a new appropriate reprimand or other sanction, including the revocation of the grant professional certification.

If the GPC is not a member of GPA, GPCI will investigate the complaint and will inform any other appropriate professional organization of the investigations results, to ensure the appropriate professional association is notified of the issues concerning their members.

## **GRIEVANCE AND DISCIPLINARY PROCEDURE**

### **A) COMMITTEE**

The Executive Committee of the Board of Directors of GPCI shall appoint, as needed, a GPCI Review Committee with an identified Chair and at least two other persons for terms to be determined by the Executive Committee of the Board of Directors. All committee members will remain confidential in regards to both the complainant and the GPC whose conduct is in question. The GPCI Review Committee shall serve to oversee any complaint to the Board concerning GPCs compliance with the Grant Professionals Association's Code of Ethics. The Board also may initiate a review if a GPC's behavior appears to warrant review and no third-party complaint has been filed or if the board feels an independent investigation is warranted. The GPCI Board also may file a complaint with the GPA Ethics Committee if it is a more appropriate jurisdiction. The GPCI Review Committee shall review any complaints made regarding the violation of the Grant Professionals Association's Code of Ethics by a GPC. The members of the GPCI Review Committee shall be GPCs, and a board member of GPCI may serve on the GPCI Review Committee.

### **B) NOTICE OF REVIEW**

Anyone may lodge a complaint against a GPC based on the Grant Professionals Association's Code of Ethics. If an ethical complaint has been forwarded to the GPA Ethics Committee, the GPCI Board will have the option to delay the review of the complaint in order for GPA to rule on the issue(s) or proceed with an independent investigation at the discretion of the GPCI Executive Committee. If no GPA review is imminent or an independent review is sought, the following procedures will be used.

Any complaint shall be directed to the President of the Board in a written document. The written notice should include all known information and must contain at a minimum the information listed below. The complaint should be forwarded by mail or email to the GPCI President and marked "CONFIDENTIAL"

- Name, address and phone number of the GPC in question
- Name, address and phone number of the complainant
- Date, time or timeframe, and place of the incident
- Description of the incident, which should be as specific and factual as possible
- Name(s), address(es) and phone number(s) of any and all witnesses involved

Once a complaint is received by the GPCI President, it shall be reviewed and a GPCI Review Committee will be formed or if the GPCI review committee is currently constituted, the complaint will be forwarded to the Chair. The GPCI Review Committee will determine whether the complaint has reliable and sufficient information to find probable cause of a violation of the Grant Professionals Association's Code of Ethics.

Within thirty (30) days of receipt by the GPCI President, the Chair of the GPCI Review Committee shall take one of the following actions:

1. If the complaint is determined to be frivolous or not substantive, the Chair of the GPCI Review Committee shall recommend to the GPCI Board to dispose of the written report by mailing a letter to the complainant stating the reason(s) for return.
2. If it is determined there is probable cause that the complaint is valid and actionable, the complainant shall be notified in writing. Any information provided by the complainant may be used in the investigative process. The person named in the complaint will then be notified and will have 30 days to respond to the complaint by submitting a written response to the GPCI Review Committee Chair.

At this stage of the process, the only individuals within GPCI privy to the names of the individual GPC being considered for disciplinary action shall be limited to the Board President and the GPCI Review Committee members. Discussions with GPCI Review Committee members and recommendations to the Board shall use the individual's GPC identification number as an identifier.

Specifically, if the GPCI board learns of a possible violation by a GPC, the GPCI Board may initiate the disciplinary process against the GPC on its own or may file an ethics complaint with the GPA Ethics Committee as appropriate. If the GPCI Board pursues a complaint on its own, the matter shall be sent to the Chair of the GPCI Review Committee to determine whether there is reliable and sufficient information to find probable cause of a violation of the Grant Professionals Association's Code of Ethics. If it is determined there is probable cause and the complaint is valid and actionable, the Board shall be notified at that time.

In addition to any action taken by GPCI, the Chair of the GPCI Review Committee shall forward the complaint to the chairs of the appropriate disciplinary bodies of the professional associations in which the individual is a member for possible further action.

### **C) INFORMAL RESOLUTIONS**

If the Chair of the GPCI Review Committee determines there is probable cause and a complaint is valid and actionable, but the matter is capable of resolution without formal proceedings, and the GPC is amenable, the Chair of the GPCI Review Committee may attempt to resolve the complaint through an informal process directly with the GPC. The Chair of the GPCI Review Committee shall provide a written report of any such determination to the GPCI Board of Directors.

#### **D) EMERGENCY SUSPENSION**

If the President of the Board of Directors determines there is probable cause and a GPC has violated the Grant Professionals Association's Code of Ethics and such violation poses an immediate threat to public health or safety, then the Board may temporarily suspend the credential of the GPC, pending further investigation and a final determination by the GPCI Review Committee.

#### **E) NOTIFICATION AND RESPONSE**

If the Chair of the GPCI Review Committee finds probable cause a complaint is valid and actionable, the Chair will inform the President of the Board. The President shall notify the GPC whose conduct is in question via certified, return receipt mail. If the GPCI board has temporarily suspended the GPC credential due to an immediate threat to public health or safety, such suspension shall be included in the notification.

Upon receipt of notification, the GPC in question has thirty (30) days to respond and provide additional information in writing. Any information provided may be used in the investigative process.

#### **F) INVESTIGATIVE PROCESS**

**REVIEW:** The GPCI Review Committee shall review the matter and determine its severity. All valid and actionable matters shall be investigated by the GPCI Review Committee and may seek legal counsel throughout the process.

**INVESTIGATION:** The GPCI Review Committee may contact the complainant, the GPCI board, or the GPC who is the subject of the investigation (the respondent) for additional information with respect to the matter. The Chair of the GPCI Review Committee shall supervise and direct all GPCI Review Committee members and use discretion concerning who may have knowledge of facts and circumstances surrounding the matter.

**CONFIDENTIALITY:** GPCI shall attempt to conduct all investigations in confidence, objectively and without any indication of prejudice. An investigation may be directed toward any aspect of a matter which is relevant or potentially relevant. Formal hearings are not conducted. Members of the GPCI Review Committee are expected to represent the interests of the public. GPCI Review Committee members are volunteers but may be reimbursed for expenses under applicable guidelines of the GPCI Board.

**DELIBERATION OF THE GPCI REVIEW COMMITTEE:** There is no time limit on deliberation. The Chair of the GPCI Review Committee shall ensure each GPCI Review Committee member presents an opinion and both sides of the issue are discussed. The outcome of the deliberation shall be decided by majority vote.

A determination of a violation and recommendation of sanction shall be completed through a voting process by the GPCI Review Committee immediately after the deliberation. This vote shall be recorded in writing. A rationale for the decision shall be included. All GPCI Review

Committee members must sign a confidentiality agreement regarding all aspects of the violation and outcome.

**RECORDS:** Recorded minutes of the deliberation are the property of GPCI and may only be reviewed as a reference in the aid of a fair determination of the alleged violation.

### **G) DETERMINATION OF VIOLATION**

Upon completion of deliberations, the GPCI Review Committee shall determine whether there has been a violation of the Grant Professionals Association's Code of Ethics. Should the GPCI Review Committee make a determination there has been a violation, the GPCI Review Committee shall recommend the imposition of a reasonable sanction that relates to the nature and severity of the violation, focusing on the reformation of the conduct of the GPC and the deterrence of similar conduct by others. The determination and recommended sanction shall be communicated in writing to President of the GPCI Board to begin the approval process.

If the GPCI Review Committee finds no violation has occurred, the Chair of the GPCI Review Committee shall communicate in writing to the President of the GPCI Board who will communicate with the complainant and the GPC. The matter shall be dismissed with a written notice to the GPC and complainant.

GPCI may deny, suspend, revoke or take other action regarding the GPC if an individual is found in violation of this policy. Grounds for disciplinary action include (but are not limited to):

1. An irregular event in connection with a GPC examination, including (but not limited to) copying examination materials, causing a disruption in the testing area and failure to abide by reasonable test administration rules;
2. Disclosing, publishing, reproducing, summarizing, paraphrasing or transmitting any portion of the exam in any form or by any means, verbal, written, electronic or mechanical, without the prior express written permission of GPCI;
3. Plagiarism on a grant related article, white paper or application, whether in whole or in part;
4. Providing fraudulent or misleading information on any of the following documents: GPC Eligibility Packet, Certification Maintenance Program (CMP) application, any grant application and/or any grant report;
5. Gross or repeated negligence in professional work;
6. Proof of embezzling, theft or another criminal act;
7. The conviction, plea of guilty to or plea of *nolo contendere* to a felony or misdemeanor related to the grants profession; and
8. Other unprofessional conduct as determined by GPCI.

### **H) SANCTIONS**

GPCI may impose one or more of the following sanctions for a violation of this Grievance and Disciplinary Actions Policy:

1. **Censure** – Censure may be invoked with respect to professional misconduct not deemed sufficiently severe to warrant greater sanction. An unpublished written reproach from the Board of Directors, which may include a requirement that the respondent undertake specified training or education or that the respondent modify her/his office charter or standard practices, shall be mailed to the respondent. A copy of this letter shall become a permanent part of the respondent's certification file. In the event of such a censure, the GPC would retain certification status and all of its rights and privileges, provided that she/he complies with any requirements imposed by the GPCI Board in conjunction with the censure.
2. **Probation** – A respondent may be placed on probation for a period not to exceed three (3) years; should, during the period of probation, any further professional misconduct complaints be found to be substantiated, the respondent's GPC status shall be suspended or revoked, as determined by the GPCI Review Committee and the GPCI Board. In addition, the GPCI Board may require that the respondent undertake specified training or education or that the respondent modify her/his office charter or standard practices. A GPC placed on probation would retain certification status and all of its rights and privileges during the period of probation, provided that she/he complies with any requirements imposed by the GPCI Board in conjunction with the probation.
3. **Suspension** – GPC status may be suspended for a specified period of time not to exceed three (3) years based upon the severity of the professional misconduct. At the conclusion of the period of suspension, the grant professional may apply to the GPCI Board for reinstatement of her/his GPC status. Had the GPC, absent such suspension, been subject to a recertification.
  - a. requirement during the period of suspension, such recertification requirement shall be imposed
  - b. as part of the reinstatement process. A GPC whose certification status is suspended shall, immediately upon such suspension, not be entitled to any of the rights and privileges of certification status during such period of suspension.
4. **Revocation** – GPC status may be revoked and said individual may be forever barred from applying for certification. A GPC who has had her/his certification status revoked is not eligible for reinstatement of certification status. A GPC whose certification status has been revoked.
  - a. shall, immediately upon such revocation, no longer be entitled to any of the rights and privileges of certification status. Revoked certificates and letters of official award of certification must be returned to GPCI once notice is received. Notice of revocation of the credential shall be published on the GPCI website.

- 5. Additional Disciplinary Sanctions** – The GPCI Review Committee may recommend and the GPCI Board may impose additional disciplinary sanctions, including without limitation mandatory professional education or other sanctions approved by the GPCI Board.

#### **I) APPROVAL OF THE RECOMMENDATION OF SANCTIONS BY GPCI BOARD**

It is the responsibility of the agency to assure the GPCI mission, the Grant Professionals Association’s Code of Ethics, procedures and policies are adhered to by the GPCI Review Committee Chair and committee members. If a recommendation from the GPCI Review Committee is found to be incongruent with policies, procedures, the mission statement, the Grant Professionals Association’s Code of Ethics or legal advice, the GPCI Board may ask the GPCI Review Committee or GPCI Review Committee Chair to revise the recommendation.

The recommendations are reviewed to determine ONLY to ensure the process and outcome is consistent with the Board’s current policies, procedures, guidelines and the Grant Professionals Association’s Code of Ethics. The GPCI Review Committee Chair may be present during the board review of the recommendation. The GPCI Board may confer with legal counsel to determine approval.

**VOTING:** The recommendation is stated in a motion by a GPCI Board member and seconded. Only Board members not involved in the investigation may vote. Anyone who may have a bias must declare their bias and abstain from voting. The recommendation is approved or rejected by a majority vote of the remaining members of the Board. In the event there is an even number, the President of the Board shall vote. If there are no members on the Board who qualify to vote, the GPCI Board President shall confer with legal counsel to approve or reject the recommendation. If a Board member is the subject of the complaint, the Board member shall be excused during discussion and voting. If the recommendation is not approved, modifications shall be considered with the involvement of the Chair of the GPCI Review Committee.

The outcome of the vote is effective immediately.

**REPORTING:** After making their final decisions, the Board of Directors shall submit the outcomes to the Chair of the GPCI Review Committee for action.

#### **J) NOTIFICATION OF SANCTIONS**

Following approval of a sanction, the GPC shall be notified via certified, return receipt mail. A copy shall be sent to the complainant, if there is one and to GPA. Determination that the GPC has been notified must be verified before any other parties are informed of the outcome. Written notice shall be provided to any related professional association of which GPCI is aware the GPC is a member.

#### **K) RESIGNATION**

GPCI shall not accept the voluntary resignation of any GPC who is the subject of a disciplinary investigation.



#### **L) ADMISSION OF GUILT**

Investigative procedures shall be stopped and the GPCI Review Committee shall recommend a sanction to the GPCI Board for approval and notification, if a GPC who is the subject of a disciplinary investigation admits to having violated the Grant Professionals Association's Code of Ethics, policies or any requirements established by the GPCI Board that are the subject of the investigation. By admission of guilt, the GPC waives his/her right to an investigation process.

#### **M) VIOLATION OF GPA'S CODE OF ETHICS**

If a GPC is found by GPA to have violated its Code of Ethics, GPCI may review the actions taken or may conduct their own investigation. GPA will be asked to submit to the GPCI Board their actions and make a recommendation of a sanction or revocation of Grant Professional Certified (GPC). However, GPCI will not be held to the recommendations of GPA and GPCI committee may determine a separate or different course of action should be taken. When GPA has imposed a reprimand or other sanctions, GPCI will honor those actions and upon review of the facts presented, will vote to accept, add too or create a new appropriate GPCI sanction or action including the possibility of revocation of grant professional certified (GPC).

#### **N) VIOLATION OF OTHER – CODES OF ETHICS**

If a GPC is found by another professional association of which he or she is a member to have violated its Code of Ethics, the professional association will be asked to submit to the GPCI Board their actions and make a recommendation of a sanction or revocation of Grant Professional Certified (GPC). However, GPCI will not be held to the recommendations of the other professional organization and GPCI committee may determine a separate or different course of action should be taken. In an instance where another body has imposed a reprimand or other sanctions, GPCI will honor those actions and upon review of the facts presented, will vote to accept, add to or create a new appropriate GPCI sanction and/or action including the possibility of revocation of grant professional certified (GPC).

#### **O) APPEAL OF RULING**

A respondent who wishes to appeal the disposition of the complaint may do so by completing the Appeal section of the Grievance and Disciplinary Actions Reporting Form and returning it to the GPCI President within thirty (30) days of receiving notification of ruling. Three to five members of the GPCI Review Committee who did not participate in the original review of the complaint, along with the committee chair and co-chair, will serve as the Appeals Panel. The Appeals Panel will consider all originally submitted documentation from both parties, the original ruling, and the stated reason for appeal. The Appeals Panel will either affirm the original ruling or recommend an alternative ruling. The GPCI Board will then vote to either uphold the original ruling or accept the Appeals Panel's recommended ruling; the vote will be conducted among board members who did not participate in the review/appeal process.

The Board's decision on the appeal is final.