

Feldenkrais Guild® of North America

E2.2.1.17 NATAB Process for Addressing Complaints About FGNA Certified Trainers

This policy guides the process to determine whether the Trainer certification of an FGNA Certified Trainer ought to be suspended or revoked.

A. ACTIONS THAT COULD RESULT IN SUSPENSION OR REVOCATION OF TRAINER

CERTIFICATION STATUS

1. Removal or loss of *Feldenkrais*® Practitioner certification, which would result automatically in the loss of FGNA Trainer certification.
2. Confirmed violations of FGNA policies including but not limited to the Code of Professional Conduct, *Feldenkrais Method*® Standards of Practice, and Training Accreditation Policy.
3. Trainer not functioning at the level of or in accordance with the Trainer competencies, as identified in the FGNA Guidelines for Certification as a *Feldenkrais* Trainer.
4. Loss of membership in good standing in an IFF-member guild or association.

Being an Educational Director involves additional competencies over and above those of a Trainer. In some circumstances a Trainer may be removed as Educational Director of a training program, while retaining their Trainer status.

B. INFORMATION SHARING AND CONFIDENTIALITY

1. The North American Training Accreditation Board (NATAB) is authorized to share information regarding a complaint with individuals who are involved in the active review or resolution of the complaint. FGNA may also share information about the complaint as necessary or helpful to fulfill its commitments to preserving its ethical standards, and professional practices and behaviors. NATAB may consider requests for confidentiality, while balancing the request with FGNA's need to fulfill its commitments.
2. Any member of NATAB who receives any inquiry or information from an individual that could lead to a complaint or is related to a current complaint must report this to the NATAB Chair. Any further contact must be coordinated with NATAB.

C. COMPLAINT INITIATION

1. All complaints must be made in writing and must contain contact information for the Complainant.
2. A complaint may be filed by any person (hereafter identified as the Complainant) against any FGNA Certified Trainer (hereafter identified as the Respondent).
3. A complaint must be factual and refer to a specific practice or behavior as outlined in the FGNA policies. If a complaint is comprised of hearsay only, rather than a description of the Complainant's direct experience or as a witness of the practice or behavior, NATAB will be limited in its ability to take action.
4. Complaints and all follow-up correspondence should be sent to the following address via U.S. Mail, Certified with a return receipt requested, or by another method that includes proof of delivery:

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NATAB

Feldenkrais Guild of North America

401 Edgewater Place, Suite 600

Wakefield, MA 01880

5. A complaint may be withdrawn for any reason when requested in writing by the Complainant.

D. COMPLAINT ACKNOWLEDGEMENT

1. A receipt will be generated and sent to the Complainant, and a copy of this Policy will be included.
2. The complaint will be forwarded to the NATAB Chair.
3. A complaint may also be initiated by NATAB or the Ethics Committee. In this case, NATAB or the Ethics Committee will be the Complainant.

E. COMPLAINTS INVOLVING ETHICS COMMITTEE AND BOARD OF DIRECTORS

1. The NATAB Chair and NATAB Liaison to the Ethics Committee shall share information and collaborate with the FGNA Ethics Committee, Board of Directors and others who are involved in the active review or resolution of the complaint as necessary to support the review, investigation and resolution of the complaint.
2. Complaints that only involve potential violations of the FGNA Code of Professional Conduct or Standards of Practice for the *Feldenkrais Method* of Somatic Education shall be referred to the Ethics Committee. Complaints that only involve the educational process or other aspects of Trainer behavior will be reviewed by NATAB.
 - 2.1. If a complaint is reviewed by both NATAB and the Ethics Committee, potential violations of the Code of Professional Conduct or Standards of Practice will be reviewed by the Ethics Committee, and parts of the complaint that involve the educational process or other aspects of Trainer behavior will be reviewed by NATAB.
 - 2.2. If a part of a complaint involves both potential violations of the Code of Professional Conduct or Standards of Practice and the educational process or other aspects of Trainer behavior, the Ethics Committee will consider the aspect that involves potential violations of the Code of Professional Conduct or Standards of Practice, and NATAB will consider the aspect that involves the educational process or other aspects of Trainer behavior
 - 2.3. If a complaint, or a part of a complaint is determined to be only a potential violation of the Code of Professional Conduct and/or Standards of Practice, that complaint or part of the complaint shall no longer be part of the NATAB process unless it is returned to NATAB by the Ethics Chair.
 - 2.4. The requirements of this section may be modified by agreement of the NATAB Chair and the Ethics Committee Chair if necessary, to support the review of any complaint.

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F. COMPLAINT REVIEW

1. NATAB shall review the complaint. If the complaint includes only claims that, if true, would not constitute a violation of FGNA policies or a failure to meet the Trainer competencies, the Complainant shall be informed and the process will conclude.
2. If the complaint includes any claims that, if true, would constitute a violation of FGNA policies or a failure to meet the Trainer competencies, NATAB shall proceed with the following steps, which may be adapted when NATAB is working in collaboration with the Ethics Committee:
 - 2.1. If circumstances or additional information are identified which warrants immediate temporary suspension of Trainer certification, the NATAB Chair will recommend this action to the Board of Directors. The Board of Directors reserves the right to impose an immediate temporary suspension of FGNA Trainer certification if there is potential harm to trainees or the public, or if the good name or good will of FGNA is endangered.
 - 2.2. If NATAB has reason to believe a complaint requires legal advice prior to proceeding, the NATAB Chair will make the request to the Board of Directors Chair.
 - 2.3. A NATAB representative shall respond to the Complainant, requesting permission to share the complaint with the Respondent.
 - 2.4. If the Complainant has granted permission, NATAB shall forward the complaint to the Respondent, and shall offer the Respondent an opportunity to respond to the complaint. If the Complainant does not grant permission to share a copy of the complaint with the Respondent, FGNA may be limited in its ability to take action and may not be able to follow this Protocol. The NATAB Chair may take action as directed by the Board.
 - 2.5. NATAB shall review the response, if applicable.
3. If NATAB determines that there has been no material violation of FGNA policies or no failure to meet the Trainer competencies, the Complainant and the Respondent shall be informed, and the process shall be closed.

G. HEARING

1. NATAB shall notify the Respondent of the Policy or Trainer competency that NATAB has determined has been violated or not met, NATAB's initial recommendation, the Respondent's right to request a Hearing, and the process for such a Hearing.
2. The respondent will be afforded fifteen (15) days from the date of the notification letter to request a Hearing. The request must be made in writing and must be sent to NATAB via U.S. Mail, Certified with a return receipt requested, or by another method that includes proof of delivery.
3. If the respondent requests a Hearing, NATAB will conduct the proceedings and may have legal counsel present. NATAB will determine the format of the Hearing (e.g. by telephone).
4. The Respondent may choose to participate, will be afforded up to 30 minutes to address the complaint, and may be represented by legal counsel.

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5. Complaints involving the same or similar conduct may be combined into one (1) Hearing.

H. NATAB DETERMINATION

1. If NATAB finds that FGNA policies have been violated or the Respondent has failed to meet the Trainer competencies, NATAB will determine the appropriate disciplinary action, which may include any of the following:
 - 1.1. **Reprimand:** A statement of recognition of behavior contrary to FGNA policies that the Respondent must correct immediately. The Respondent must submit proof of correction within the time frame directed by NATAB.
 - 1.2. **Probation:** Probation for a defined period of time, of not more than one (1) year. Probation may include conditions for the Respondent's authorization to work as an FGNA Certified Trainer during this period. This action will allow the Respondent to initiate a course correction. NATAB will convene at the end of the probationary period to determine whether to recommend that probation end or be continued.
 - 1.3. **Suspension:** Suspension of FGNA Trainer Certification for a defined period of time, requiring compliance with specific corrective actions before the suspended rights are restored. NATAB will convene at the end of the suspension period to determine whether to recommend that suspension end or be continued. During the suspension period, the Respondent must not work as a *Feldenkrais* Trainer in any training program accredited by FGNA, and must not in any way identify themselves as being a *Feldenkrais* Trainer, in any materials or media that is released in the US and Canada.
 - 1.4. **Revocation:** Revocation of *Feldenkrais* Trainer certification. The Respondent may not work or teach as a *Feldenkrais* Trainer in any training program accredited by FGNA, and must not in any way identify themselves as being a *Feldenkrais* Trainer, in any materials or media that is released in the US and Canada.
 - 1.5. In all cases of disciplinary action, NATAB may require additional conditions for the Respondent to be authorized to work in FGNA accredited *Feldenkrais* training programs in a role other than Trainer.
 - 1.6. The NATAB Chair will notify the Board of Directors President of NATAB's finding.
 - 1.7. The NATAB Chair will notify the Respondent of NATAB's finding, in writing via U.S. Mail, Certified with a return receipt requested, or by another method that includes proof of delivery.
 - 1.8. The Respondent will be afforded fifteen (15) days from the date of the notification letter to appeal NATAB's finding. The Respondent's appeal must be made in writing and addressed to the Board of Directors President, sent via U.S. Mail, Certified with a return receipt requested, or by another method that includes proof of delivery.

I. APPEAL TO THE BOARD OF DIRECTORS

1. If a timely appeal is received by the Board of Directors, the Board will determine, based on written material provided by the Complainant and Respondent to NATAB, whether to affirm or amend the decision of NATAB. The Board may consider input

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from the NATAB Chair. The Respondent and NATAB will be notified by the Board of Directors President of the decision of the Board.

J. PUBLIC NOTIFICATION

1. Disciplinary Actions of suspension and revocation will be published by FGNA, citing the Trainer's first and last name, and the date and type of action. Other *Feldenkrais Method* Training Accreditation Boards, Guilds and Associations will also be informed of these actions, and may also be informed if Educational Director status has been removed.

The Board of Directors and NATAB may modify the processes outlined in this policy as necessary for any complaint.

Adopted September 26, 2018 by FGNA Board of Directors