10540 Marty Street, Suite 240, Overland Park, KS 66212-2596
(913) 788-3000 • www.grantprofessionals.org • staff@grantprofessionals.org

GPA Public Statement on the GPA Code of Ethics and Application Outside of GPA Membership

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The Grant Professionals Association (GPA) Ethics Committee has seen an increasing number of questions regarding the scope of the GPA Code of Ethics and whether it applies to organizations, including vendors, consulting firms, and other companies working in the grants field. In the interest of advancing ethical behavior within the profession, the GPA Ethics Committee has prepared the following guidance for GPA members on applying the Code of Ethics outside of individual actions in cases regarding pricing models that include percentage-based compensation. We invite any entity working in the grants field to engage directly with GPA on questions they may have or for further clarification.

ETHICS COMMITTEE GUIDANCE

The GPA Ethics Committee's guidance is that:

1. Percentage-based compensation models (whether applied to individuals, consultants, or vendors) are counter to the GPA Code of Ethics; and
2. Members are called upon to uphold the standards stipulated in the GPA Code of Ethics and to firmly and respectfully advocate for ethical practice throughout the field.

Please see below for further details.

ACCEPTING A COMMISSION

GPA serves grant professionals, including consultants, who are an essential part of the grants industry. The GPA Code of Ethics, including standards about commission-based pay, applies to all grant professionals, including consultants. Even if the service is marketed as a platform or tool and not direct grant writing, if compensation is tied to the success of a grant award, it meets the definition of commission-based compensation under the Code.

The term "commission" in the context of the GPA Code of Ethics does apply to consultants. The Code specifically states:

> "Please note that it is in violation of the Grant Professionals Association (GPA) Code of Ethics for any member to accept a percentage of a grant award as compensation for grant writing, or any services related to a grant submission." (*See the note at the bottom of the website page https://grantprofessionals.org/page/ethics.*)
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> And
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> "19. Members shall not accept or pay a finder's fee [3], commission [4], or percentage compensation based on grants and shall take care to discourage organizations from making such payments."

ETHICAL PRACTICES FOR ALL GRANT PROFESSIONALS

GPA does not have organizational-level members; therefore, any examinations or sanctions regarding the GPA Code of Ethics would be at the individual/professional level. However, the GPA Code of Ethics does not exist in a vacuum. It is essential that members commit to and actively advocate for ethical practices.

This is where the phrase “shall take care to discourage organizations from making such payments” is important. While GPA cannot impose sanctions on a company for offering an award-based payment structure, members are expected to uphold the standards of the profession by advising clients and employers of ethical concerns and the potential financial and compliance risks associated with commission-based compensation. “Taking care to discourage” includes choosing not to participate in these arrangements, educating decision-makers, and raising concerns when such practices occur. When in doubt, GPA members and the general public are encouraged to consult with peers and colleagues and reach out to the GPA Ethics Committee. The GPA Ethics Committee developed the GPA Ethical Decision-Making Best Practices for Grant Professionals tool to assist with these dilemmas. We would encourage the use of this tool when faced with a potential ethical situation.

The GPA Code of Ethics is intended to guide the field, not just members. The GPA Code of Ethics outlines the core standards of ethical conduct in the grants profession. The principles of honesty, transparency, accountability, and respect established in the GPA Code of Ethics have been widely adopted by funders, employers, and institutions. The tenets of the code parallel the tenets of comparable organizations in fundraising and other fields. The Code is meaningful not only to individual practitioners but also applies to vendors, consulting firms, and organizations that provide grant services or operate within the funding ecosystem.

Any entity presenting itself as a professional contributor in the grants space (particularly in the US and Canada) benefits from the trust and credibility of the field that grant professionals have worked to build. With that trust and credibility comes the responsibility to uphold the ethical norms and standards that sustain it, which are found in the GPA Code of Ethics. To disregard those norms and standards is to risk the erosion of the public trust. We should all be concerned with any devaluation of the professional legitimacy on which the field depends.

The GPA Code of Ethics applies to the act of writing a grant proposal and other activities involved with grant submission, including the identification of potential grant awards, commonly referred to as grant prospect research. Even when vendors are not performing grant writing themselves, a fee structure that takes a percentage of awarded funds constitutes commission-based compensation. The payment is still directly tied to the grant award and, therefore, diverts funds from the organization and, consequently, the purpose for which the grant was awarded. Organizations that enter into these arrangements may unintentionally violate cost principles, exposing themselves to audit findings that may jeopardize future funding.

GPA is not a regulatory body but rather a membership organization dedicated to serving grant professionals. While the GPA sets the standard for commitment to ethical practices in the grants industry, it does not have jurisdiction over entities outside of its membership. However, grant professionals have an interest and a responsibility to adhere to guidelines we have established for our profession -- and to communicate clearly when business practices violate the standards of ethical conduct defined in the GPA Code of Ethics.

Please direct inquiries regarding the GPA Code of Ethics to ceo@grantprofessionals.org.