

TABLE OF CONTENTS

l.	MISSION				
II.	POLICY				
III.	RELATIONSHIP TO OTHER AGREEMENTS				
IV.	TERMINOLOGY2-				
V.	AMGA CODE OF ETHICS AND CONDUCT3-				
VI.	SCOPE OF TH	HE AMGA CODE OF ETHICS AND CONDUCT	3-5		
VII.					
VIII.					
• • • • • • • • • • • • • • • • • • • •			_		
		Reporting Code Violations			
	C. Article 2:	Timeframe for Reporting	6		
	_	Complaint Intake	_		
	3.1	Overview	6		
	3.2	Speak Up Process Flowchart	7		
	3.3	Tier 1 Complaints	6		
	3.4	Tier 2 Complaints	6-8		
	3.5	Scope of Practice Complaints	8		
	3.6	Criminal Complaints	8		
	3.7	AMGA Relationship to Third-Party Firm	8		
	3.8	Complaint Intake Process for Tier 1 and Tier 2 Complaints	9		
	E. Article 4:	Investigation and Adjudication	9-19		
	4.1	Investigation Guidelines	_		
	4.2	Investigation Procedures (Tier 1 complaints)	11-12		
		4.2.a Investigation Timeline			
		4.2.b Complaint Intake and Review			
		4.2.c Communication Between Parties			
		4.2.d Resolution of Tier 1 Complaints			
	4.3	Investigation Procedures (Tier 2 Complaints)	12-15		
		4.3.a Investigation Timeline			
		4.3.b Complaint Intake and Review			
		4.3.c Notification of Investigation			
		4.3.d Respondent Contribution to Investigation			

			4.3.e Investigation (Finding of Facts)
			4.3.f Failure to Cooperate
			4.3.g Submission of Findings to PCC
		4.4	Review and Decision by PCC15-19
			4.4.a Review Team Composition
			4.4.b Impartiality of PCC Review
			4.4.c Conflict of Interest
			4.4.d PCC Review Timeline
			4.4.e PCC Review Procedures
			4.4.f Request for Additional Information
			4.4.g Decision Guidelines
			4.4.h Sanction Guidelines
			4.4.i PCC Final Report
			4.4.j Sanction by AMGA Administration or Board of Directors
			4.4.k Notice of Decision
			4.4.l Enforcement
	F.	Article 5:	Appeal Process19-21
		5.1	Submitting a Request for Appeal19
		5.2	Appeal Timeline19
		5.3	Appeal Intake21
		5.4	Appeal Review and Decision21
		5.5	Appeal Documentation21
	G.	Article 6:	Program Feedback and Review22
IX.	AP	PENDICES	
	A.	AMGA Me	mber Agreement22-23
	В.	Anti-Hara	ssment and Prohibited Behavior Policy24-25
	C.	Logo and	Brand Use Policy26-32
	D.	Scope of	Practice33-42

I. MISSION

The mission of the American Mountain Guides Association (AMGA) Professional Compliance Program is to promote professional integrity among AMGA members for the benefit of the AMGA community, the industry, and the public.

The commitment AMGA members make to uphold high ethical and professional standards is unique in the guided climbing and skiing industry. This distinguished commitment, coupled with AMGA professional training and certification, gives the public the confidence to know they are experiencing the outdoors with the most competent and trustworthy professionals in the industry.

II. POLICY

The AMGA Professional Compliance Manual consists of the following documents:

- 1. AMGA Code of Ethics and Conduct
- 2. Professional Compliance Procedures
- 3. Anti-Harassment and Prohibited Behavior Policy
- 4. Scope of Practice
- 5. Logo and Brand Use Policy
- 6. Member Agreement

Taken together, these policies describe the ethical and professional expectations of AMGA members and the process by which alleged violations of the *AMGA Code of Ethics and Conduct* are investigated and adjudicated. The Professional Compliance Manual is supported by the:

- 1. AMGA Bylaws
- 2. Conflict of Interest Policy
- 3. Employee Manual
- 4. Accredited Business Contract
- 5. Accreditation Manual
- 6. Provider Agreement
- 7. Provider Qualifications and Expectations

III. RELATIONSHIP TO OTHER AGREEMENTS

The Professional Compliance Manual describes the process by which allegations of misconduct under the *AMGA Code of Ethics and Conduct* are reviewed and adjudicated. Other policies, agreements, and contracts further describe the expectations of AMGA employees, Board members, Accredited Businesses, and Climbing Instructor Program Providers.

When matters arise that pertain to the expectations articulated in these other policies, agreements, and contracts, and which fall outside the scope of the *AMGA Code of Ethics and Conduct*, the AMGA will respond in accordance with the terms and conditions set forth in the applicable policy, agreement, or contract. If an infraction occurs that is subject to the *AMGA Code of Ethics and Conduct* and other AMGA policies, agreements, or contracts, the AMGA may choose to review and adjudicate the infraction under the Professional Compliance Procedures and/or the other policies, agreements, or contracts.

The other policies, agreements, and contracts that apply to employees, Board members, Providers, and Accredited Businesses are as follows:

- 1. AMGA employees Employee Manual
- 2. AMGA Board of Directors members Conflict of Interest Policy
- 3. <u>AMGA Climbing Instructor Program (CIP) Providers</u> *Provider Agreement & Provider Qualifications* and *Expectations*
- 4. AMGA Accredited Businesses Accredited Business Contract & Accreditation Manual

The Professional Compliance Manual is not intended to supplant, and does not affect, any rights and/or obligations that may exist under local, state, and federal laws. The activities of AMGA Accredited Businesses, in particular, may be subject to a broad range of labor, employment, anti-discrimination, and other laws, and may be subject to oversight by local, state, and federal regulatory agencies.

Where an allegation of misconduct under the AMGA Code of Ethics and Conduct involves an issue for which a local, state, or federal adjudicatory body (such as a court or a regulatory agency) has jurisdiction, AMGA may choose to refer the complainant to that local, state, or federal adjudicatory body, rather than investigating and adjudicating the allegation under the processes outlined in this Professional Compliance Manual. Furthermore, where the findings of a local, state, or federal adjudicatory body reveal that a violation of the AMGA Code of Ethics and Conduct has occurred, AMGA may rely upon those findings and reserves the right to require corrective actions and issue sanctions, consistent with this Professional Compliance Manual, without conducting a separate investigation into the alleged misconduct.

IV. TERMINOLOGY

The following terms are used in the AMGA Professional Compliance Manual when describing the ethical and professional expectations of AMGA members and the process by which alleged violations of the AMGA Code of Ethics and Conduct are investigated and adjudicated.

AMGA Professional Compliance Committee	The AMGA Professional Compliance Committee (PCC) is a standing committee assembled for the purpose of reviewing alleged violations of the AMGA Code of Ethics and Conduct to determine if a violation occurred and if a sanction should result. For additional information see Section VII.
AMGA Staff	In the context of this document, the term AMGA Staff refers to the AMGA Deputy Director and the AMGA Membership Director. These are the individuals at the AMGA who are designated to investigate complaints and oversee the operation of the Professional Compliance Program. The AMGA may, from time to time, designate additional or different individuals to assist with or oversee the operation of the Professional Compliance Program. In this case, the AMGA will make public the names of those individuals.
Complaint	When an AMGA member or a member of the public reports an alleged violation of the AMGA Code of Ethics and Conduct to the AMGA, it is called a complaint .
Complainant	The person who submits a complaint to the AMGA is called the complainant .
Respondent	The person who is accused of violating the AMGA Code of Ethics and Conduct is called the respondent .
Witness	A person who has knowledge of the circumstances of an alleged violation of the AMGA Code of Ethics and Conduct is called a witness .
Tier 1 complaint	A complaint of lesser severity in which the investigator facilitates a resolution between the complainant and respondent. The Professional Compliance Committee does not review tier 1 complaints. For additional information see Article 3.3.
Tier 2 complaint	A complaint of greater severity in which the findings of an investigation are reviewed by the Professional Compliance Committee. For additional information see Article 3.4.
Investigation	When a complaint is submitted, the AMGA will contact the complainant, respondent, or witness(es) to learn more about the circumstances of the allegation(s) and find facts that may help determine if a violation of the AMGA Code of Ethics and Conduct occurred. This process of finding facts is called the investigation .
Investigator(s)	The person or group of people conducting an investigation are referred to as the <code>investigator(s)</code> .

Investigations Law Group (ILG)	The AMGA may contract the assistance of outside experts to review complaints, investigate complaints, and advise AMGA on matters related to complaints. At the time of this writing, the AMGA is working with Investigations Law Group , a third-party investigations firm specializing in workplace compliance and investigations.
Decision	After the Professional Compliance Committee reviews the facts pertaining to an allegation of misconduct, the PCC determines if a violation of the <i>AMGA Code of Ethics and Conduct</i> occurred and if a sanction should result. The determination of the PCC is called the decision . The PCC reaches a decision by consensus. For additional information see Article 4.4.
Appeal	If a respondent disagrees with a decision, they can request to have the decision reconsidered by a separate body of reviewers through a process called appeal . For additional information see Article 5.

V. AMGA CODE OF ETHICS AND CONDUCT

The AMGA Code of Ethics and Conduct (page 4) demonstrates the commitment AMGA members make to uphold high standards of ethics and professionalism. The AMGA Code of Ethics and Conduct ensures exceptional service to the public, promotes respect and integrity among AMGA members, and advances the professionalism of the industry.

VI. SCOPE OF THE AMGA CODE OF ETHICS AND CONDUCT

The AMGA Code of Ethics and Conduct applies to all AMGA members in circumstances when a member is acting in a professional capacity or engaging in personal activities that have a direct reflection on the AMGA. The Code of Ethics and Conduct applies to communications and/or actions made in person, in print, through social media, email, or other forms of electronic communication. Violation of the Code of Ethics and Conduct may result in corrective action as outlined in the Professional Compliance Manual.

The following examples are provided to illustrate the scope of the AMGA Code of Ethics and Conduct. The examples are intended to help AMGA members understand the types of circumstances in which the AMGA Code of Ethics and Conduct applies. This list is not intended to identify each and every circumstance that may fall under the AMGA Code of Ethics and Conduct.

	The <i>AMGA Code of Ethics and Conduct</i> Would Apply to Any Actions and Communications Made When:		
An AMGA Member is acting in a professional capacity, for example:	 When actively instructing or guiding a group of clients When working with another AMGA member during the course of employment When communicating with a potential client about a potential climbing trip When meeting with a land manager to discuss the application process for a land use permit When discussing employment opportunities with an employer or employee 		
An AMGA Member is engaging in a personal activity that has a direct reflection on the AMGA, for example:	 When giving a presentation to a local climbing club When interacting with the public while climbing recreationally at a local crag When participating in an online forum that relates to climbing and skiing When communicating with an AMGA member outside of work hours When establishing new climbing routes in an area with specific regulations (e.g., wilderness) 		

The AMGA Code of Ethics and Conduct



- 1. Managing risk and the welfare of our clients is our prime concern.
- 2. Where possible and practical, we should provide assistance to persons having difficulty by offering help which is appropriate under the circumstances. In providing assistance to others, we should avoid compromising the welfare of our clients.
 - 3. Our clients have the right to expect us to be up to date on the latest methods and techniques and to use appropriate and well-functioning equipment.
- 4. We must be aware of our own physical, technical, and experiential limitations. We should use routes and terrain that are within our expertise and capabilities.
 - 5. We are expected to teach and practice Leave No Trace principles and to be knowledgeable of local natural history.
- 6. We facilitate a welcoming and inclusive environment for all people, regardless of their intersecting identities whether based in gender, race, sexuality, religion or any other identity.
 - 7. We will not engage in any form of discrimination, harassment, or other prohibited behavior as described in the Anti-Harassment and Prohibited Behavior Policy.
- 8. As representatives of the AMGA we must conduct ourselves in a manner that reflects well on the AMGA. This applies during AMGA programs as well as anytime we are interacting with clients, the public, our fellow guides, government agencies, and others.
- 9. We must understand our level of training and certification as defined by the AMGA Scope of Practice (SOP). After July 1, 2022, we will work only within our training and certification level(s) as defined by the SOP.
- 10. We will accurately and unambiguously represent the level of our training and certification to clients, the public, government agencies, and others as described in the AMGA Brand Use Policy.
- 11. We must work within the regulatory, permit, certification, and aspirant requirements of the country and/or land management agency in or under which we intend to work. We must obey all laws, rules, and regulations applicable to our guiding or other activities.

VII. PROFESSIONAL COMPLIANCE COMMITTEE (PCC)

The PCC is a standing committee assembled for the purpose of reviewing alleged violations of the AMGA Code of Ethics and Conduct and determining if a violation should result in a sanction. The PCC is governed by the AMGA Board of Directors as described in the AMGA Bylaws, Article 8.9. The duties of the PCC are overseen by a Chairperson who is appointed by the AMGA Board of Directors. Additional members of the PCC are recommended by the Chairperson and appointed by the Board of Directors.

The PCC may be composed of members of the AMGA Board of Directors, AMGA members who are unaffiliated with the AMGA Board of Directors, SPI Providers, representatives from AMGA Accredited Businesses, AMGA legal counsel, members of the AMGA instructor team, members of the AMGA Technical Committee, and members of the public. The Chairperson will seek to assemble a committee that is diverse in terms of race, age, gender identity, level of training and certification, area of expertise, and regional representation.

The Professional Compliance Committee conducts reviews of allegations of misconduct and determines whether a violation of the AMGA Code of Ethics and Conduct has occurred. If the PCC believes a violation has occurred, the PCC may issue or recommend a sanction. Sanctions that include suspension or revocation of credentials or membership, or sanctions which include public censure, must be executed by a three-fourths (3/4) vote of the Board of Directors as stated in the AMGA Bylaws, Article 3.10.

A complete outline of the process by which the PCC reviews and decides upon allegations of misconduct can be found in *Article 4.4: Review and Decision by Professional Compliance Committee*.

VIII. PROFESSIONAL COMPLIANCE PROCEDURES

A. Preamble

The American Mountain Guides Association is committed to promoting professional integrity among AMGA members for the benefit of the AMGA community, the industry, and the public. The AMGA Code of Ethics and Conduct and Professional Compliance Procedures provide a framework for high ethical standards among AMGA members. As part of AMGA membership, an AMGA member pledges to uphold the standards outlined in the AMGA Code of Ethics and Conduct and agrees to enforcement of the AMGA Code of Ethics and Conduct under the Professional Compliance Procedures. This commitment ensures exceptional service to the public, promotes respect and integrity among AMGA members, and advances the professionalism of the industry.

The *Professional Compliance Procedures* describe the process by which alleged violations may be reported, investigated, reviewed by a decision-making body, and appealed. The process is designed to be credible to the AMGA membership and fair to those who are involved in a complaint.

The *Professional Compliance Procedures* take effect on January 1, 2022 and will be utilized for all Speak Up reports thereafter. Past reports that were resolved under the previous Speak Up procedures (or other procedures that existed prior to Speak Up) will not be reconsidered under the *Professional Compliance Procedures*.

B. Article 1: Reporting Code Violations

If an individual believes there has been a violation of the AMGA Code of Ethics and Conduct, the individual may report the alleged violation to the AMGA through the Speak Up program (amga@ilghotline.com or www.amga.com/speak-up/). Complaints submitted through the AMGA Speak Up program are received and processed by Investigations Law Group (ILG), a third-party investigations firm. Upon receiving a complaint, ILG determines the severity of the infraction, documents the complaint information, and provides a report to AMGA staff.

Reported violations of the AMGA Code of Ethics and Conduct will be investigated promptly, objectively, and as confidentially as possible as described in the investigation guidelines (Article 4.1) and investigation procedures (Articles 4.2 and 4.3). If it is determined that an AMGA member has engaged in behavior that is in violation of the AMGA Code of Ethics and Conduct, the member will be subject to corrective action, up to and including revocation of membership.

Complaints may be submitted anonymously. However, anonymous complaints will limit the AMGA's ability to complete a thorough investigation. Additionally, the AMGA will not share the findings of an investigation with complainants whose identities have not been provided.

C. Article 2: Timeframe for Reporting

It is strongly encouraged to report violations within six months of occurrence in order to facilitate accurate evidence collection and a timely decision. Delays in reporting may make it difficult for AMGA to gather information and reach a definitive conclusion regarding the alleged violation. The AMGA reserves the right not to investigate alleged violations that are not reported within 2 years of occurrence.

D. Article 3: Complaint Intake

3.1 Overview. Complaints may be submitted through the <u>Speak Up portal on the AMGA website</u>, via the reporting hotline administered by ILG (<u>amga@ilghotline.com</u>), or directly to an employee of the AMGA. When a complaint is received, it is reviewed for severity and identified as either "tier 1," "tier 2," or "Scope of Practice." Considerations for determining if a complaint is tier 1 or tier 2 are provided in Articles 3.3 and 3.4. Depending on the circumstances of the complaint, it may be investigated by Investigations Law Group and/or AMGA staff as described in Article 3.8.

3.2 Speak Up Process Flowchart. (See next page for flowchart)

- **3.3 Tier 1 Complaints.** When determining if a complaint is a tier 1 complaint, the following concepts may be considered along with other relevant information. There is no "one size fits all" set of criteria for determining if a complaint is tier 1. If an investigator is uncertain about whether or not a complaint can be treated as tier 1, the process for tier 2 complaints should be used.
 - a. The alleged behavior does not rise to the threshold of discrimination, harassment, sexual harassment, or retaliation as described in the *Anti-Harassment and Prohibited Behavior Policy*
 - b. The respondent has not had previous complaints filed about their behavior
 - c. The investigator is comfortable communicating directly with the complainant and respondent to promote a restorative approach to repairing harm
 - d. The investigator, complainant, and respondent are comfortable working together to review the situation and reach a resolution that is agreed upon by all parties
 - e. The complainant feels the offense can be addressed through the tier 1 process
 - f. A remedy for the situation can be facilitated without the involvement of the Professional Compliance Committee
 - g. Generally speaking, tier 1 complaints are handled with an emphasis on open communication and restorative practices
- **3.4 Tier 2 Complaints.** The following examples are illustrative of situations in which the process for tier 2 complaints should be used. The list is not exhaustive and other situations may exist that warrant the process for tier 2 complaints. If an investigator is unsure about whether or not a complaint should be treated as tier 2, the investigator should take a conservative approach and use the process for tier 2 complaints.
 - a. The complaint alleges behavior that constitutes discrimination, harassment, sexual harassment, or retaliation as described in the *Anti-Harassment and Prohibited Behavior Policy*
 - b. The respondent has had previous complaints submitted about their behavior
 - c. The complaint involves violence, serious injury, or fatality
 - d. The complaint may involve illegal activity



Speak Up Process Flowchart

Complaint Received

Complaints come to the AMGA in the following formats:

- AMGA Website
- Direct to AMGA Staff
- Through Investigations
 Law Group (ILG)
 (amga@ilghotline.com)

Investigator Determined

An investigator** is identified who will complete the complaint intake process and conduct an investigation

Investigation

- If Tier 2: Investigator finds facts and sends a report to the Professional Compliance Committee (PCC)
- If Tier 1: Investigator communicates directly with the complainant and respondent to establish a restorative approach (no report to PCC)
- If SOP: See below for details

If SOP

- SOP violations are sent to an SOP review team within the PCC
- SOP review team investigates and reaches a decision
- Complainant and respondent are notified of the outcome

Intake Form Completed

Document:

- Date of the complaint
- Description
- Potential violations of the AMGA Code of Ethics and Conduct*
- Decide whether the complaint is Tier 1, Tier 2, or Scope of Practice (SOP)

Notification

Investigator notifies complainant and respondent in writing that AMGA has received the complaint and outlines next steps

PCC Review and Decision

- PCC reviews all details of the investigation
- PCC reaches a decision
- Complainant and respondent are notified of the outcome

Appeals

If a respondent believes there has been an error in the process they may appeal the decision by submitting a written Request for Appeal to the AMGA staff who investigated the complaint, or to ILG

FOR MORE DETAILS AND THE FULL PROFESSIONAL COMPLIANCE PROCEDURES, VISIT: AMGA.COM/SPEAKUP

*Violations of the AMGA Code of Ethics and Conduct by AMGA employees, members of the AMGA Board of Directors, Providers, and Accredited Businesses may be reviewed and adjudicated under the Professional Compliance Procedures and/or other AMGA policies, agreements, and contracts as described in Article 3 of the Professional Compliance Manual

**Investigators may include the AMGA Deputy Director, Membership Director, ILG, or other individuals designated by the AMGA and made public. Investigators will be selected to avoid a conflict of interest (see Article 3.8 of the Professional Compliance Manual).

- e. The alleged behavior has the potential to damage the reputation of the AMGA
- f. The complainant feels the offense warrants the process for a tier 2 complaint
- g. There is a threat to the safety of an AMGA member
- h. The investigator determines they are unable to facilitate a remedy for the situation and the involvement of the Professional Compliance Committee is necessary
- **3.5 Scope of Practice Complaints.** Complaints pertaining to AMGA Scope of Practice will be documented by AMGA staff and/or ILG and forwarded to a PCC review team that has knowledge of common guiding terrain in the U.S. and an in-depth understanding of AMGA SOP requirements. The PCC review team that specializes in SOP complaints is called an "SOP review team."
 - a. The complaint intake form and any associated information about the complaint will be sent to the Chair of the SOP review team
 - b. The Chair will review the complaint information and identify an investigator who will complete the investigation, called the "SOP investigator"
 - c. The SOP investigator may be any member of the SOP review team who will not be involved in the decision
 - d. The SOP investigator will find facts related to the alleged SOP violation and prepare a summary of the findings
 - e. The investigation summary, with the names of involved parties removed, will be provided to a group of at least three (3) members of the SOP review team for review
 - f. The SOP review team will review the investigation summary to determine if a violation occurred and if a sanction will result
 - g. The SOP review team will document the decision in writing, including their rationale for the decision, and provide it to the SOP investigator to share with the complainant and respondent
 - h. The SOP investigator will communicate the decision in writing to the complainant and respondent
 - i. Scope of Practice complaints should be resolved within 90 days whenever possible

3.6 Criminal Complaints.

Criminal complaints received by the AMGA will be forwarded to the relevant authorities. If AMGA receives a complaint for which a criminal investigation is already underway, AMGA may decline to investigate until the criminal case is closed.

3.7 AMGA Relationship to Third-Party Firm. The AMGA contracts with Investigations Law Group to assist with the intake and investigation of complaints. ILG is a third-party investigations firm that specializes in workplace investigations, professional compliance, and human resources consulting. ILG receives complaints on behalf of the AMGA, reviews them for severity, and identifies which items of the AMGA Code of Ethics and Conduct may be violated. After completing the intake process, ILG sends the information to AMGA staff for follow up and investigation. In some instances, AMGA staff may ask ILG to perform an investigation on behalf of the AMGA (when staff workloads preclude involvement, there is a conflict of interest, etc.). See Article 3.8 below for additional information.

3.8 Complaint Intake Process for Tier 1 and Tier 2 Complaints

a. Complaint is received

i. Once a complaint is submitted through the AMGA website or amga@ilghotline.com, it will be received by ILG, documented on an intake form, reviewed to determine the severity of the alleged infraction, and then forwarded to AMGA staff for follow up and investigation

- ii. If a complaint is provided directly to an AMGA employee, it will be referred to ILG for initial intake, review, and documentation
- iii. AMGA staff may request assistance from ILG at any point before or during an investigation

b. Intake Form completed

i. Documents the date of the complaint, description of the complaint, potential violations of the *AMGA Code of Ethics and Conduct*, complainant's desired outcome, and whether the complaint is tier 1, tier 2, or Scope of Practice

c. Investigator(s) determined

- i. AMGA Staff and ILG will work together to identify an investigator who will complete the complaint intake process and conduct an investigation
- ii. Investigators can include: AMGA Staff or investigator(s) from ILG
- iii. In the case of an SOP complaint, the Chair of the SOP review team will appoint a member of the SOP review team to serve as the investigator
- iv. The investigator must be impartial and have no conflict of interest

d. No conflict of interest

- i. A conflict of interest may include but is not limited to: the complaint is about the investigator, the investigator has close relations with the complainant or respondent, or the investigator would benefit personally or professionally from a particular outcome
- ii. If an investigator identifies a personal or professional conflict of interest related to a complaint, whether it is known at the outset of the complaint or arises during the investigation process, the investigator will step down and a new investigator will be identified

e. Complainant notified that AMGA has received their complaint

- i. Investigator notifies complainant in writing that AMGA has received the complaint and is determining next steps
- ii. The notification should provide a timeframe in which AMGA will follow up with additional information (see Articles 4.1, 4.2.a, 4.3.a)
- iii. The notification may be delivered by email or certified mail using the email address or mailing address provided to the AMGA by the complainant
- iv. The notification should be delivered to the complainant within 30 days from the date on which the complaint was received
- v. The investigator will facilitate additional communication with the complainant as needed to learn about the circumstances of the complaint and find facts

E. Article 4: Investigation and Adjudication

4.1 Investigation Guidelines. When conducting an investigation into an alleged violation of the *AMGA Code of Ethics and Conduct*, the AMGA observes the following guidelines to promote timeliness, objectivity, confidentiality, transparency of process, and consistency from one investigation to another.

a. Timeliness

 Investigations completed in a prompt manner are more likely to obtain complete and accurate information about an alleged violation, which in turn promotes fair, evidencebased decision making.

- ii. Whenever possible, investigations into tier 1 complaints will be completed within 60 days from the date of intake and investigations into tier 2 complaints will be completed within 90 days from the date of intake.
- iii. When unexpected circumstances hinder the investigation or decision process, the AMGA will communicate with all parties in a timely manner to provide an updated timeline.

b. Objectivity

- i. The investigator's primary responsibilities are to facilitate communication with the complainant, respondent, and any witness(es); gather relevant information pertaining to the alleged violation; and document the findings.
- ii. The investigator will remain objective throughout the investigation process. This includes maintaining a presumption of innocence until the investigation is complete.
- iii. If an investigator has a personal or professional conflict of interest related to the investigation, whether it is known at the outset of the investigation or arises during the investigation, the investigator should refer the complaint to another AMGA staff member or Investigations Law Group as described in the complaint intake flow chart.

c. Confidentiality

- i. Information pertaining to the identities of complainant(s), respondent(s), witness(es), and others who are party to the investigation will be kept confidential, to the extent allowed by law, throughout the investigation and after the investigation is complete unless sharing such information is necessary to complete the investigation.
- ii. The names of the complainant, respondent, and witness(es) and any information that could disclose their identities will not be revealed to decision makers to promote impartiality in the decision-making process and fairness for the complainant and respondent.
- iii. Complaints submitted to the AMGA may be done so anonymously to maintain full confidentiality of the complainant. However, anonymous complaints will limit the AMGA's ability to complete a thorough investigation. Additionally, the AMGA will not share the findings of an investigation with complainants whose identities have not been provided.
- iv. If interviews with complainant(s), respondent(s), or witness(es) will be recorded using audio and/or video recording tools, notification must be provided to all parties participating in the interview and all parties must give their permission to allow the recording of the interview.

d. Transparency of process

- i. The AMGA Professional Compliance Procedures should be readily available to AMGA members on the AMGA website and in paper format (paper format available upon request).
- ii. Investigators will communicate clearly in writing with complainants and respondents about the process, policies, and timeline that the investigation will follow.
- iii. Respondents will be notified in writing of the allegation(s) made against them and they will be made aware that an investigation is underway.
- iv. Complainants and respondents will be notified in writing when an investigation has concluded and the findings are sent to the Professional Compliance Committee for review.
- v. Witness(es) will be notified when an investigation and review has been completed but may not be informed of the findings or corrective actions taken.
- vi. If a language barrier exists and an interpreter is necessary to facilitate understanding of the investigation process, AMGA staff may be contacted to arrange support.

e. Consistency of process

- i. Investigators should follow the investigation guidelines and investigation procedures (Articles 4.1-4.3) to foster consistency from one investigation to another.
- ii. Consistency in approach enhances the credibility of the professional compliance program and contributes to fairness for those whose behavior is being evaluated.
- iii. If an investigator wishes to deviate from the guidelines and procedures, the reason for the deviation should be documented and included in the summary of findings.

4.2 Investigation Procedures (Tier 1 Complaints). In accordance with the *AMGA Member Agreement*, the AMGA has the authority to commence an investigation into the behavior of an AMGA member who is the subject of a complaint (the "respondent"). The following procedures outline the process that is followed in the investigation of a **tier 1 complaint**. When a complaint is identified as tier 1, an investigator will facilitate direct communication between the complainant and respondent in order to promote a restorative approach in the review and decision process. The investigator, complainant, and respondent work together to review the situation and reach a resolution that is agreed upon by all parties. Because the review and decision process is completed among the involved parties, the findings of the investigation are not sent to the PCC for review and decision.

Complaint Intake and Review

- Complaint is received, reviewed, & communication is opened with complainant
- Article 3.7: Complaint Intake Process
- · ≤ 30 days

Investigation

- Information is gathered by Investigator(s)
- Resolution facilitated
 & agreed upon by all parties
- PCC contacted if no resolution met
- ≤ 60 days

Resolution of Tier 1 Complaints

 Completed in ≤ 90 days (approximate)



4.2 Tier 1 Investigation Procedures

4.2.a Investigation Timeline (approximate)

- i. Complaint intake and review completed within 30 days
- ii. Investigation completed within 60 days
- iii. Resolution of tier 1 complaint completed within 90 day

4.2.b Complaint Intake and Review

i. Complaint is received and reviewed, and communication is established with the complainant, as outlined in Article 3.7: Complaint Intake Process

4.2.c Communication with Parties

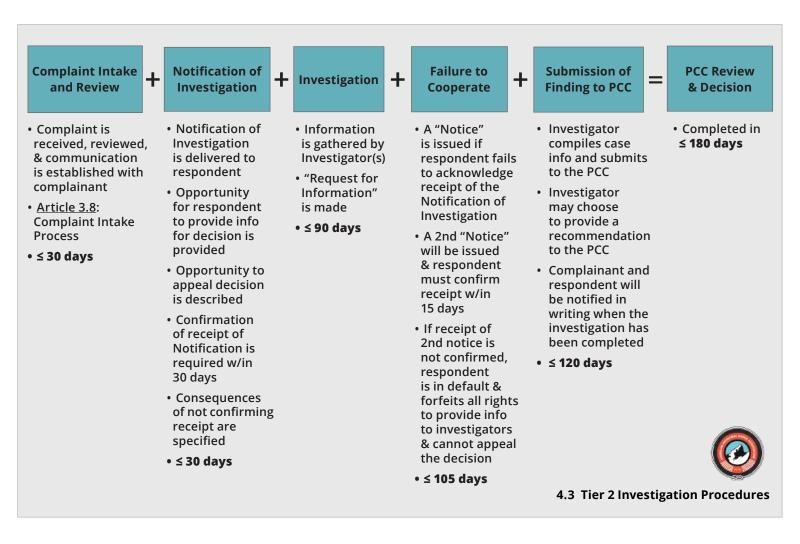
- i. When a complaint has been identified as tier 1, the investigator will facilitate open communication between the complainant and respondent in order to promote a restorative approach to repairing harm
- ii. Investigator should begin by gathering information from the complainant and respondent separately

iii. If the complainant is seeking a remedy that the investigator is capable of facilitating (e.g., an apology), the investigator can bring the parties together to discuss the situation and reach a resolution

4.2.d Resolution of Tier 1 Complaints

- i. Once a resolution is agreed upon by all parties, the investigator documents the resolution in writing
- ii. The resolution should state that the complaint is closed by way of agreement with the resolution and no further actions or remedies will be considered
- iii. A copy of the resolution should be provided to the complainant and respondent
- iv. If a resolution cannot be reached by the involved parties, the investigation findings should be sent to the PCC for review and decision

4.3 Investigation Procedures (Tier 2 Complaints). In accordance with the *AMGA Member Agreement*, the AMGA has the authority to commence an investigation into the behavior of an AMGA member who is the subject of a complaint. The following procedures outline the process that is followed in the investigation of a **tier 2 complaint**. In the process for tier 2 complaints, the findings of the investigation will be sent to the PCC for review and decision.



4.3.a Investigation Timeline (approximate)

- i. Complaint intake and review completed within 30 days
- ii. Notification of investigation completed within 30 days
- iii. Investigation completed within 90 days
- iv. Failure to cooperate established within 105 days (if relevant)
- v. Submission of findings to PCC completed within 120 days
- vi. PCC review and decision completed within 180 days

4.3.b Complaint Intake and Review

i. Complaint is received and reviewed, and communication is established with the complainant, as outlined in Article 3.8: Complaint Intake Process

4.3.c Notification of Investigation

- i. Investigator delivers a written Notification of Investigation to the respondent to notify them an investigation is underway
- ii. The Notification of Investigation may be delivered by email or certified mail using the email address or mailing address on file for the respondent
- iii. The Notification of Investigation should:
 - 1) Notify the respondent they are under investigation
 - 2) Describe the allegation(s) made and list the items in the AMGA Code of Ethics and Conduct that may be violated
 - 3) Describe the investigation, review, and decision process and provide an approximate timeline for each step
 - 4) Inform the respondent about the opportunity to share their point of view and provide information that will be considered when a decision is made
 - 5) Inform the respondent they will receive written notice of the decision and they will have the opportunity to appeal the decision if they disagree with it
 - 6) Require the respondent to confirm receipt of the Notification of Investigation within 30 calendar days of delivery
 - 7) Describe the consequences of not responding to the Notification of Investigation within 30 calendar days (see section 4.3.f for details)

4.3.d Respondent Contribution to Investigation

- i. The respondent will have the opportunity to provide information to the investigation that will be considered when a decision is made
- ii. The respondent will be notified in the Notification of Investigation about the opportunity to share their point of view and provide information
- iii. The respondent will have 30 days from the date of the Notification of Investigation to submit information to the investigator(s)
- iv. Respondent contributions sent by physical mail services must be postmarked within 30 days from the date of the Notification of Investigation
- v. The information provided by the respondent will be included in the investigation summary and will be shared with the PCC (and appeal review team, if an appeal is brought)

vi. The 30-day time period from the date of the Notification of Investigation is the only opportunity the respondent will have to provide information; however, exceptions may be made for extraordinary circumstances that warrant an extension of the 30-day timeline

4.3.e Investigation (finding of facts)

- Investigator contacts respondent, complainant, and witness(es) as needed to gather facts about the case
- ii. Investigator documents all information on the AMGA Investigation Summary Form
- iii. When contacting the respondent, the investigator may ask the respondent to provide information about the circumstances of the allegation(s), provide answers to questions, and/or either admit or deny the truth of matters asserted by the AMGA (collectively referred to as "Requests for Information")
- iv. Requests for Information may be made in the Notification of Investigation or the investigator may make them later
- v. Requests for Information may be made in writing, over the phone, or through in-person communication
- vi. Investigator should document all Requests for Information
- vii. When making a Request for Information, the Investigator will:
 - Inform the respondent that a Request for Information must be responded to within 30 calendar days
 - 2) Describe the consequences of not cooperating with the Request for Information within 30 calendar days (see section 4.3.f for details)

4.3.f Failure to Cooperate

- i. If respondent fails to deliver a timely acknowledgment of receipt of the Notice of Investigation or fails to cooperate with a Request for Information, the investigator will re-deliver the Notification of Investigation and/or Request for Information (referred to as a "Notice")
- ii. If a re-delivery is required, the second Notice should be sent in writing using both email and certified mail
- iii. The second Notice should:
 - 1) Indicate it is the second Notice provided to the respondent
 - 2) If a Request for Information was made previously, re-state the Request for Information
 - Describe the allegation(s) made and list the items in the AMGA Code of Ethics and Conduct that may be violated
 - 4) Describe the investigation, review, and decision process and provide an approximate timeline for each step
 - 5) Inform the respondent about the opportunity to share their point of view and provide information that will be considered when a decision is made
 - 6) Inform the respondent they will receive written notice of the decision and they will have the opportunity to appeal the decision if they disagree with it
 - 7) Require the respondent to confirm receipt of the second Notice within 15 calendar days of delivery; however, exceptions may be made for extraordinary circumstances that warrant an extension of the 15-day timeline

- 8) Responses sent by physical mail services must be postmarked within 15 days from the date of the second Notice
- 9) Describe the consequences of not responding to the second Notice within 15 calendar days
- iv. If Respondent fails to respond to the second Notice within 15 calendar days of delivery, the respondent is in default
- v. Once in default, the respondent relinquishes the opportunity to:
 - 1) Provide information to the AMGA about the circumstances of the allegation(s)
 - 2) Appeal the decision made by the AMGA

4.3.g Submission of Findings to PCC

- i. Investigator finishes compiling information about the case to submit to the Professional Compliance Committee for review and decision
- ii. The information should be organized in the Investigation Summary Form along with any relevant attachments (copies of emails, screenshots of images, etc.)
- iii. The identities of complainant(s), respondent(s), and witness(es) should be concealed to protect their confidentiality and ensure the decision-making process is fair and impartial
- iv. The investigator may choose to provide a recommendation to the Professional Compliance Committee
- v. The complainant and respondent should be notified in writing that an investigation has been completed
 - 1) The notification should indicate the findings of the investigation are being reviewed by the AMGA Professional Compliance Committee
 - 2) The notification should provide a timeframe in which the AMGA will follow up with additional information (see Article 4.4.d)
- **4.4 Review and Decision by Professional Compliance Committee.** In the case of a tier 2 complaint, the findings of the investigation will be sent to the Professional Compliance Committee for review and decision. For more information about the PCC, please see Section VII: Professional Compliance Committee.

4.4.a Review Team Composition

- i. The Chair of the PCC will assemble a group of 3 or more individuals from the PCC, called the "review team," to review the findings of an investigation and reach a decision
- ii. The Chair of the PCC should select review team members that the Chair would not reasonably expect to have a conflict of interest (see Article 4.4.c)
- iii. In the event the Chair of the PCC is implicated in a complaint, the investigator will communicate with another member of the PCC to assemble the review team
- iv. The review team should be composed of participants who have experience, knowledge, credentials, and/or other characteristics that will enable them to understand the circumstances of the allegation(s) and act fairly on behalf of the complainant and respondent in evaluating those circumstances
- v. The review team should have representation from diverse identities
- vi. No member of a review team can have an open complaint filed against them or have a past violation of the AMGA Code of Ethics and Conduct on file

4.4.b Impartiality of PCC Review

- A separation between investigator(s) and adjudicator(s) will exist whereby investigator(s) will serve only to provide information to the PCC but will never act as a decision-making participant of the PCC
- ii. Investigator(s) will submit the findings of an investigation to the PCC in a format that conceals the identities of the complainant, respondent, witness(es), and businesses/organizations with which they are affiliated to promote impartiality in the decision-making process and fairness for the complainant and respondent

4.4.c. Conflict of Interest

- i. If a member of the PCC identifies a personal or professional conflict of interest related to a complaint, whether it is known at the outset of the review process or arises during the review process, the PCC member must present the conflict to the Chair of the PCC
- ii. If the Chair believes the conflict cannot be mitigated, the PCC member must step down from the review team and the Chair will appoint a replacement
- iii. Examples of conflict of interest include but are not limited to: a member of the PCC determines the complainant or respondent is a person with whom they have a close personal or professional relationship, a member of the PCC determines they would benefit from a particular decision made by the PCC, or a member of the PCC identifies a personal or professional bias that could negatively affect their ability to reach an evidence-based decision

4.4.d PCC Review Timeline

i. Whenever possible, complaints should be reviewed and decided upon within 60 days from the date the investigator provides complaint information to the PCC

4.4.e PCC Review Procedures

- i. Information pertaining to a complaint will be submitted to the PCC Chair by the investigator(s) who conducted the investigation
- ii. Upon receipt of the complaint information, the PCC Chair will assemble a review team as described in Article 4.4.a and provide them with the complaint information
- iii. The PCC Chair will convene the review team in a meeting to discuss the findings of the investigation and reach a decision
- iv. All members of the review team must be present for the meeting
- v. The meeting may take place over the phone, on video conference, or in person
- vi. All materials submitted by the investigator(s) will be reviewed and discussed, and each participant will be provided the opportunity to ask questions, request additional information, and share their perspective

4.4.f Request for Additional Information

- i. If additional information is needed for the PCC to reach a decision, the PCC may send a written request for additional information to the investigator(s)
- ii. Requests for additional information should clearly specify what additional information is needed and provide any related details that could help the investigator(s) fulfill the request
- iii. If a PCC request for additional information necessitates an extension of the timeline for the investigation and review, the investigator will notify the complainant and respondent of the new timeline on which the process will be completed

4.4.g Decision Guidelines

- i. Once the complaint information has been reviewed, the review team will determine if a violation of the AMGA Code of Ethics and Conduct has occurred
- ii. If a violation occurred, the review team will determine if the respondent should be issued a sanction
- iii. All PCC decisions will be reached by consensus

4.4.h Sanction Guidelines

- i. If the review team determines it is necessary and appropriate to issue or recommend a sanction, the sanction should be commensurate with the offense
- ii. When determining a sanction, the review team may consider circumstances such as the severity of the offense, the effect on the reputation of the AMGA, whether it was a first offense or a repeat of similar behavior, etc.
- iii. When determining a sanction, the PCC may ask the investigator(s) to provide an outline, with identities removed, of previous cases that are similar in nature to the case under consideration
- iv. Sanctions may include but are not limited to: a warning letter, professional development, suspension of membership, revocation of membership, suspension or termination of Provider agreement(s), or other corrective actions. Each of these actions may be carried out in private communication with the respondent (private censure) or may be published to the AMGA membership (public censure)
- v. The PCC may **issue** a sanction under the following circumstances:
 - 1) When there is a violation of the AMGA Code of Ethics and Conduct but not a violation of other policies, agreements, or contracts
 - 2) When the sanction is a warning letter or professional development
 - 3) When the censure occurs in private
- vi. The PCC may **recommend** a sanction under the following circumstances:
 - 1) When there is a violation of other AMGA policies, agreements, or contracts beyond the *AMGA Code of Ethics and Conduct* (recommendation to the AMGA Administration)
 - 2) When the recommended sanction is a suspension or revocation of AMGA membership (recommendation to the AMGA Board of Directors)
 - 3) When censure is proposed to be public (recommendation to the AMGA Board of Directors)
- vii. Sanctions recommended to "AMGA Administration" are provided to the Executive Director and AMGA Staff, and may be implemented by other AMGA employees or the Board of Directors as necessary (e.g., the Climbing Instructor Program Manager would implement the termination of a Provider Agreement; the Executive Committee would issue a warning letter to a member of the Board of Directors)
- viii.Sanctions recommended to the AMGA Board of Directors must be approved by three-fourths (3/4) vote of the AMGA Board of Directors, as described in the *AMGA Bylaws*, *Article 3.10*

4.4.i PCC Final Report

i. The PCC review committee should document their review and decision process in the form of a final report

- ii. The final report should include:
 - 1) Complaint number, date, and members of the review team
 - 2) Summary of the findings including a description of any AMGA Code of Ethics and Conduct items that were violated
 - 3) Summary of the decision including a description of sanctions issued or recommended
 - 4) Description of relevant facts that contributed to the decision
- iii. The final report is delivered:
 - 1) To the investigator(s) if the decision does not include a sanction or if the decision includes a sanction that is issued by the PCC
 - 2) To the investigator(s) and AMGA Administration, if the decision includes a sanction that is recommended by the PCC and executed by the AMGA Administration
 - 3) To the investigator(s) and the AMGA Board of Directors, if the decision includes a sanction that is recommended by the PCC and executed by the Board of Directors
- iv. In the case of a decision that includes a sanction issued by the PCC, or a recommendation from the PCC to the AMGA Administration, the final report is only visible to the Executive Committee, Executive Director, investigator(s), PCC review team, AMGA staff, AMGA legal counsel, and the individuals overseeing an appeal (if an appeal is requested)
- v. In the case of a decision that includes a recommendation for sanction(s) to the AMGA Board of Directors, the final report is also visible to the AMGA Board of Directors
- vi. Documentation should be permanently retained by the AMGA

4.4.j Sanction by AMGA Administration or Board of Directors

- i. When a PCC decision includes a recommendation for a sanction that must be executed by the AMGA Administration or Board of Directors, the final report will be reviewed by the AMGA Administration or the Board of Directors and a determination will be made to deny the recommendation, execute the recommendation, or execute the recommendation with modification(s)
- ii. When determining a sanction, the AMGA Administration or Board of Directors must:
 - 1) Accept the investigation's factual findings as true and correct unless the factual findings are unsupported by the evidence
 - 2) Accept the PCC's interpretation and application of the AMGA Code of Ethics and Conduct unless that interpretation or application can be shown to be unreasonable or arbitrary
 - 3) Accept the PCC's recommendation for a sanction unless the sanction can be shown to be unreasonable or arbitrary
- iii. The determination will be documented and delivered to the PCC and the investigator(s) to be included in a Notice of Decision to the complainant and respondent

4.4.k Notice of Decision

- i. Once a decision has been reached by the PCC, and a sanction has been determined by the PCC, AMGA Administration, or AMGA Board of Directors, the investigator will provide a written Notice of Decision to the complainant and respondent
- ii. The PCC Chair and the investigator(s) will work together to draft the Notice of Decision to the complainant and respondent

- iii. If confidentiality is required between the complainant and respondent, individualized letters should be sent to each party
- iv. The Notice of Decision should:
 - 1) Notify the recipient that a decision has been reached
 - 2) Describe the decision including any sanctions that are issued
 - 3) If a violation of the AMGA Code of Ethics and Conduct occurred, state the provision(s) that were violated and describe why the behavior was considered to be a violation
 - 4) Communicate relevant findings from the investigation that led to the decision (if appropriate and feasible within confidentiality requirements)
 - 5) Inform the respondent they will have the opportunity to appeal the decision if they disagree with it (see Article 5 for details on appeal)
- v. The Notice of Decision should be sent within 15 days after the decision and sanction are finalized
- vi. Any witnesses consulted will be informed that the issue is now resolved and thanked for their cooperation
- vii. Once the PCC review and decision process is complete, the review team will delete all materials related to the complaint from personal devices, storage, email accounts, etc.

4.4.l Enforcement

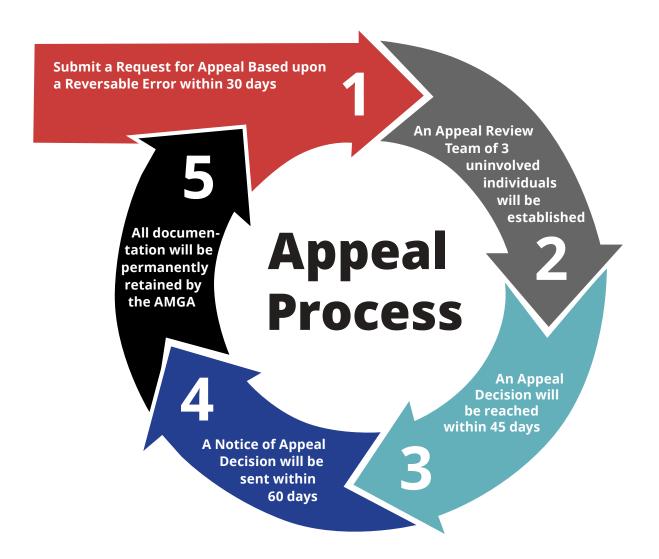
- i. Once a Notice of Decision has been delivered to the respondent, the respondent is expected to abide by any sanctions described in the Notice of Decision
- ii. The AMGA will not actively seek to observe the behavior of the respondent; however, any reports of non-compliance will be investigated promptly
- iii. A failure to abide by a sanction will constitute a violation of the *AMGA Code of Ethics and Conduct* item #11 which states, "We must obey all laws, rules, and regulations applicable to our guiding or other activities"
- iv. If the AMGA determines a respondent has failed to abide by a sanction, additional penalties may occur up to and including revocation of membership

F. Article 5: Appeal Process

5.1 Submitting a Request for Appeal. A respondent may appeal a decision of the AMGA, ILG, and/or PCC resolving an alleged violation of the *AMGA Code of Ethics and Conduct* if the respondent believes that, in reaching the decision, the AMGA, ILG, and/or PCC committed a "Reversible Error." The AMGA, ILG, and/or PCC commits a Reversible Error where it either: (1) fails to follow the processes and procedures outlined in this Compliance Manual; (2) interprets the *AMGA Code of Ethics and Conduct* in a manner that is unreasonable or arbitrary; or (3) imposes a sanction that is unreasonable or arbitrary. Appeals will not be allowed on the basis that the respondent merely disagrees with the AMGA, ILG, and/or PCC's factual findings or factual conclusions.

An appeal can be initiated by submitting a written Request for Appeal to the AMGA staff who investigated the complaint, or to ILG. The Request for Appeal must be submitted within 30 days from the date on the Notice of Decision. The written Request for Appeal should:

- a. State the request for an appeal
- b. State the decision(s) that are at issue
- c. Describe the modification of the decision that is desired



F. Article 5: Appeal Process

The written Request for Appeal must be submitted w/in 30 days from the date on Notice of Decision & should:

- State the request for an appeal
- State the decision(s) that are at issue
- Describe the modification of the decision that is desired
- Describe the grounds for a modification of the decision

The Notice of Appeal Decision will be delivered 15 days after decision was made & should:

- Notify the respondent that a decision has been reached
- Describe the decision
- Inform the respondent the verdict on the appeal is final

- d. Describe the grounds for a modification of the decision
 - i. During the appeal process the respondent may not refer to new evidence that is not contained in the record from the original PCC review
- **5.2 Appeal Timeline.** Whenever possible, appeals should be reviewed and decided upon, and the outcome communicated to the respondent and complainant, within 60 days from the date the Request for Appeal is received by the AMGA.
- **5.3 Appeal Intake.** When a Request for Appeal is received by AMGA staff or ILG, it is forwarded to the AMGA President and/or AMGA Board Chair, Executive Director, or another member of the Executive Committee as necessary to avoid a conflict of interest. The recipient will establish an appeal review team of 3 or more individuals who were not involved in the original investigation in any way.

5.4 Appeal Review and Decision

- a. The appeal team will be provided with copies of the original investigation findings, the PCC final report, and documentation of sanction(s) issued by the PCC, AMGA Administration, or Board of Directors
- b. The appeal team will review the case and the respondent's Request for Appeal to determine if the AMGA, ILG, or PCC committed a Reversible Error, as defined in Section 5.1.
- c. In reviewing the case and the respondent's Request for Appeal, the appeal team must:
 - i. Accept the original investigations' factual findings and factual conclusions as true and correct
 - ii. Consider whether the AMGA, ILG, or PCC, in resolving the alleged violation, failed to follow the processes and procedures outlined in this Compliance Manual
 - iii. Consider whether the AMGA, ILG, or PCC, in resolving the alleged violation, interpreted the AMGA Code of Ethics and Conduct in a manner that was unreasonable or arbitrary
 - iv. Consider whether any sanction imposed by the PCC, AMGA Administration, or AMGA Board or Directors is unreasonable or arbitrary
- d. The appeal team should complete their review and reach a decision within 45 days
- e. When conducting the review and reaching a decision, the appeal team should follow the same guidelines established for PCC review procedures and decision guidelines that are outlined in sections 4.4.e and 4.4.g
- f. Once a decision is reached, a written Notice of Appeal Decision should be provided to the respondent
- g. The Notice of Appeal Decision should:
 - i. Notify the respondent that a decision has been reached
 - ii. Describe the decision
 - iii. Inform the respondent the verdict on the appeal is final
- h. The Notice of Appeal Decision should be delivered to the respondent within 15 days after the decision is reached
- i. The appeal team may request the assistance of AMGA staff in the preparation and delivery of the Notice of Appeal Decision
- j. If the appeal decision modifies or reverses the decision made by the PCC, the complainant should also be notified in writing

5.5 Appeal Documentation

- a. Any documentation generated during the appeal review will be added to the final documentation retained by the AMGA.
- b. Appeal documentation is only visible to the Executive Committee, Executive Director, appeal review team, PCC review team, investigator(s), AMGA legal counsel, and AMGA staff for review and record retention
- c. Documentation should be permanently retained by the AMGA

G. Article 6: Program Feedback and Review

AMGA staff will conduct a biennial review of complaints received and decisions reached. A summary of the review will be provided to the AMGA Board of Directors and the AMGA membership in the form of a biennial report.

The information contained in the biennial report may be used by the AMGA Board of Directors to identify trends and/or areas for improvement. Additionally, AMGA members may submit feedback at any time on the procedures and policies outlined in the *Professional Compliance Manual*. Feedback may be submitted by email or other form of written correspondence to the AMGA Deputy Director or Membership Director. Feedback may be submitted anonymously; however, the AMGA is limited in its ability to act on anonymous feedback due to the inability to request additional information. Comments received will be included in the biennial report that is provided to the AMGA Board of Directors.

When preparing a biennial report, AMGA staff may include staff recommendations for improvement, if any. If the AMGA Board of Directors determines changes should be made to the *Professional Compliance Manual*, the AMGA Board of Directors may direct AMGA staff to propose draft amendments to the *Professional Compliance Manual* for consideration by the Board of Directors.

IX. APPENDICES

A. AMGA Member Agreement

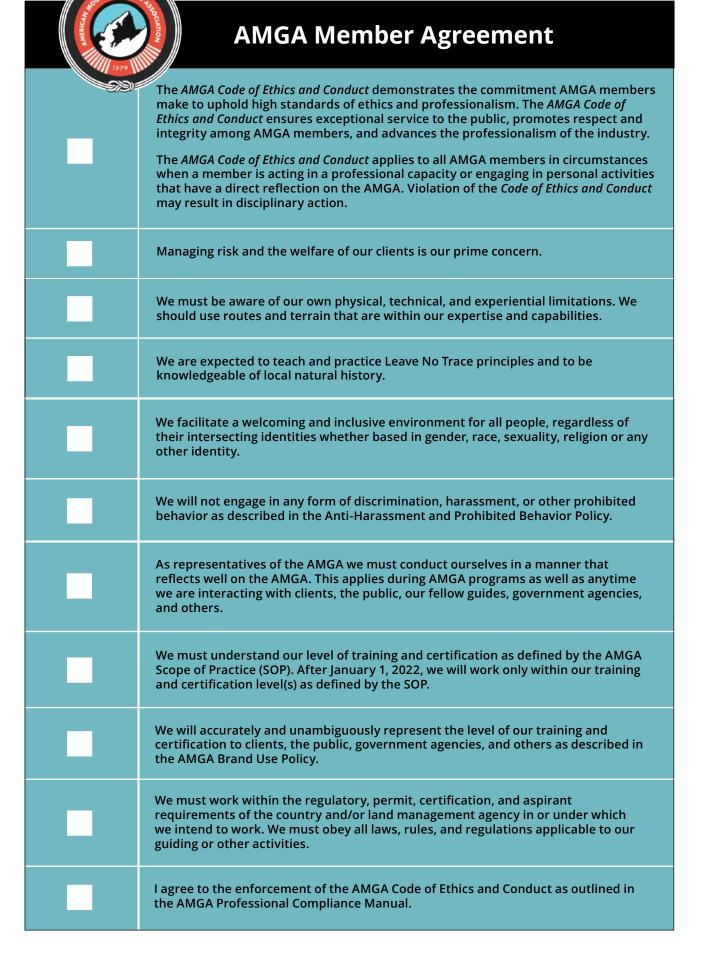
When an individual becomes a member of the AMGA or renews an existing AMGA membership, they agree to abide by the standards outlined in the AMGA Code of Ethics and Conduct and they agree to enforcement of those standards as outlined in the AMGA Professional Compliance Manual. An AMGA member makes this agreement when completing the AMGA membership sign-up form on the AMGA website. The complete AMGA Member Agreement as presented on the AMGA website is provided below.

AMGA Accredited Businesses and Climbing Instructor Program Providers also make this agreement when becoming an Accredited Business or Provider, or when renewing an Accredited Business contract or Provider agreement.

As Part of AMGA Membership:

An AMGA member pledges to uphold the standards outlined in the AMGA Code of Ethics and Conduct and agrees to enforcement of the AMGA Code of Ethics and Conduct under the policies and procedures outlined in the AMGA Professional Compliance Manual. This commitment ensures exceptional service to the public, promotes respect and integrity among AMGA members, and advances the professionalism of the industry.

To join or renew your membership with the AMGA, please check the boxes below to agree to the standards outlined in the AMGA Code of Ethics and Conduct and enforcement of the standards as described in the AMGA Professional Compliance Manual:





AMGA ANTI - HARASSMENT POLICY

Anti-Harassment and Prohibited Behavior Policy

The American Mountain Guides Association (AMGA) Code of Ethics and Conduct provides guidelines for AMGA members to uphold high standards of ethics and professionalism. Of particular importance is the promise AMGA members make to facilitate an inclusive environment and treat others with respect and dignity. The following Anti-Harassment and Prohibited Behavior Policy further articulates the commitment AMGA members make to maintaining a physically and emotionally inclusive environment.

AMGA Commitment to an Inclusive Environment

The American Mountain Guides Association is committed to maintaining a productive and inclusive environment without regard to race, color, religion, ancestry, sex¹, gender, gender identity or expression, sexual orientation, marital status, age, national origin, mental and physical disability, medical condition, genetic characteristics, genetic information, military and veteran status, or any other applicable status protected by federal, state, or local law (collectively, "protected statuses").

Policy Against Discrimination, Harassment, & Retaliation

No Discrimination

The American Mountain Guides Association prohibits discrimination by an AMGA member on the basis of any protected status. Except where otherwise indicated, the term "discrimination," as used in this policy, refers to the unfair or unequal treatment of an individual on the basis of any protected status. However, risk management decisions made by the AMGA or an AMGA member on behalf of the safety and welfare of a client or a group of clients are not considered to constitute discrimination. For example, if a guide determines an outing would pose a safety concern for a client with a disability, the guide's decision to direct the client toward a more suitable outing would not constitute discrimination.

No Harassment

The American Mountain Guides Association is committed to having an environment that is free of harassment of any kind. The AMGA will not tolerate harassment by an AMGA member. Except where otherwise indicated, the term "harassment," as used in this policy, refers to behavior that is related to any act that is offensive, intimidating, or hostile. Examples of harassment include but are not limited to epithets; slurs; derogatory jokes or comments; negative stereotyping; threats; assault; stalking; physical interference with an individual's normal activities; written or graphic material (communicated physically or electronically) that denigrates, shows hostility, or aversion toward an individual or group for any reason; and cyberstalking, which includes harassment using electronic communication such as sending a threatening email, instant messaging, or posting messages of a hateful or defamatory nature to a website, online forum, or other location on the internet.

¹ Including pregnancy, childbirth, medical conditions related to pregnancy and/or childbirth, breastfeeding and breastfeeding related conditions.

No Sexual Harassment

Because sexual harassment raises issues that are to some extent unique in comparison to other forms of harassment, the AMGA believes it warrants separate emphasis. As such, the AMGA will not tolerate sexual harassment and inappropriate sexual conduct by an AMGA member. The AMGA strongly opposes sexual harassment and inappropriate sexual conduct. Sexual harassment is defined as behavior of a sexual nature that is unwelcome and offensive to the person or persons it is targeted toward. Examples of sexual harassment may include unwelcome sexual advances (whether physical or verbal); unwanted physical contact; obscene gestures; displays of sexually explicit pictures, drawings, or caricatures; sexual jokes or remarks; and other verbal or physical conduct of a sexual nature.

Forms of Harassment

Harassment can occur in a one-on-one interaction or in a group setting. Sexual harassment can also occur in the context of a relationship that was once consensual but has changed so that the behavior is no longer welcome by one party.

The examples listed above are not meant to be a complete list of prohibited behavior. AMGA members should make a point of paying attention to others' reactions and stated requests and preferences, respect their wishes, and treat them in a professional manner regardless of gender, race, religion, nationality, age, sexual orientation, sexual identity or expression, or other protected statuses.

No Retaliation

The AMGA strictly prohibits retaliation against an AMGA member for reporting alleged prohibited behavior or for assisting in a complaint investigation. Except where otherwise indicated, the term "retaliation," as used in this policy, refers to behavior whereby an individual is treated differently, unequally, or negatively for reporting alleged prohibited behavior or for assisting in a complaint investigation. Any behavior by an AMGA member that constitutes retaliation will be subject to review and corrective action.

Reporting Violations of the AMGA Code of Ethics and Conduct

If an AMGA member believes there has been a violation of the AMGA Code of Ethics and Conduct, including discrimination, harassment, sexual harassment, or retaliation, the member may report the alleged violation to the AMGA through the Speak Up program (amga@ilghotline.com or www.amga.com/speak-up/). Complaints submitted through the AMGA Speak Up program are received and processed by Investigations Law Group (ILG), a third-party investigations firm. Upon receiving a complaint, ILG determines the severity of the infraction, documents the complaint information, and provides a report to AMGA staff.

Reported violations of the AMGA Code of Ethics and Conduct will be investigated promptly, objectively, and as confidentially as possible, as outlined in the AMGA Professional Compliance Procedures. If it is determined that an AMGA member has engaged in behavior that is in violation of this policy, the member will be subject to corrective action, up to and including revocation of membership.

Complaints may be submitted to the AMGA anonymously. However, anonymous complaints will limit the AMGA's ability to complete a thorough investigation. Additionally, the AMGA will not share the findings of an investigation with complainants whose identities have not been provided.

AMERICAN MOUNTAIN GUIDES ASSOCIATION LOGO USE POLICY (REVISED FEBRUARY 2014)

WHY DO WE NEED BRANDING GUIDELINES?

The American Mountain Guides Association (AMGA) is committed to developing our brand and communication, and to strengthening our image and identity in the marketplace. A strong organizational identity is vital because that is what the public recognizes. The aim of AMGA logos is to enhance credibility for our members, preserve the integrity of the brand, and heighten awareness of the AMGA and our mission.

AMGA's trademark, trade names and services are valuable assets. In following these guidelines, you help protect and strengthen the brand identity of the AMGA and certified members and accredited businesses. The AMGA logos are designed to enhance the AMGA's organizational identity and shape the perception and understanding of the guided public. The AMGA logo Use Policy is a guide to how all AMGA logos must be used. The logo use policy will help us produce materials the public recognizes as distinctly AMGA.

In this document, you will find the policy and guidelines for the AMGA:

- MASTER BRAND LOGO
- ACCREDITED BUSINESS LOGO
- DISCIPLINE SPECIFIC LOGOS
- EMAIL SIGNATURES WITH MASTER BRAND LOGO
- SUPPORTER LOGOS
- DEFINITION OF TERMS FOR TRAINING AND CERTIFICATION LEVELS
- FAILURE TO ADHERE TO THESE GUIDELINES

MASTER BRAND LOGO FOR THE AMGA, ITS CORPORATE PARTNERS, AND APPROVED INDUSTRY AFFILIATES



The Master Brand logo pictured in the two variations above is property of the American Mountain Guides Association (AMGA) and is not allowed to be used by any individual, that is not a Corporate Partner or Approved Industry Affiliate.

The Master Brand logo is NOT FOR PUBLIC USE, meaning that NO member, supporter, guide service or educational institution may use the pictured logo without expressed written permission from the AMGA Executive Director. Unauthorized use of the AMGA Master Brand logo may constitute trademark infringement in violation of federal and state laws. Use of AMGA Master trademark is prohibited, unless expressly authorized.

ACCREDITED BUSINESS LOGOS FOR ACCREDITED BUSINESSES

The Accreditation logo comes in the versions pictured below, which identify specific credential of a business.





AUTHORIZED USERS

AMGA Accredited Businesses

UNACCEPTABLE USES

It is unacceptable to condense, extend, skew, distort, manipulate, modify or redraw the logo in any way. Use of the Accredited Business logo shall not mislead the public in any way.

COLOR AND STYLE

The AMGA Accredited Business logo may not be modified or changed in any way. The primary colors for our logo are Pantone 419 (black), Pantone 7417C (red), Pantone 11-601TXC (white), and Pantone 7709C (blue). This is the required color combination and should be used for the color logo. It is acceptable to use the Pantone 419 (black) and 11-0601 TXC (white) logo when technical or budgetary limitations prevent use of the colored version. The name "American Mountain Guides Association" should be in a Futura typeface.



DISCIPLINE SPECIFIC LOGOS FOR CERTIFIED INDIVIDUALS

Discipline specific logos come in the versions pictured below, which identify specific credential(s) of an individual.

AMERICAN MOUNTAIN GUIDE/IFMGA GUIDE LOGO



CERTIFIED GUIDE LOGOS







INSTRUCTOR LOGOS







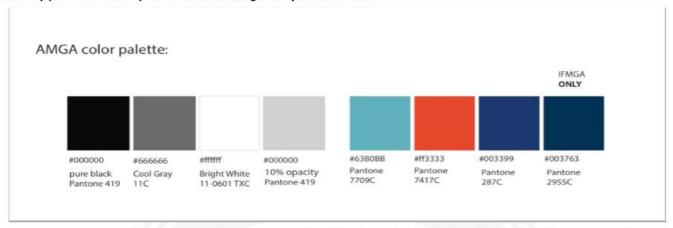
ACCEPTABLE USE

Discipline specific logos may be used within the following guidelines:

- All discipline specific logos must be used in an unaltered state.
- Only current, credentialed members who are in good standing, are permitted to use the
 discipline specific logos that correspond with the level of certification held by individuals.
- Discipline specific logos may be reproduced in print or electronically.
- Discipline specific patches are available through the AMGA Offices and are not to be reproduced by individual or entity.
- Discipline specific logos should not be used in any way that could mislead the general public.
- Only certified American Mountain Guides (AMGA/IFMGA Mountain Guides) may use the American Mountain Guide logo or the words "Mountain Guide" in association with the AMGA name or acronym.
- Only certified Alpine Guides may use the AMGA Alpine Guide logo or the words "Alpine Guide" in association with the AMGA name or acronym.
- Only certified Ski Guides may use the AMGA Ski Guide logo or the words "Ski Guide" in association with the AMGA name or acronym.
- Only certified Rock Guides may use the AMGA Rock Guide logo or the words "Rock Guide" in association with the AMGA name or acronym.
- Only certified Rock Instructors may use the AMGA Rock Instructor logo or the words "Rock Instructor" in association with the AMGA name or acronym.
- Only certified Single Pitch Instructors may use the Single Pitch Instructor logo or the words "Single Pitch Instructor" in association with the AMGA name or acronym.
- Only certified Climbing Wall Instructors may use the Climbing Wall Instructor logo or the words "Climbing Wall Instructor" in association with the AMGA name or acronym.

COLOR AND STYLE

The approved color palette for the logos is pictured below:



- American Mountain Guides may use the black & white, or the "IFMGA only" navy color (#003763), version of the American Mountain Guide logo with Future type font.
- Alpine Guides may use the black & white, or the ice blue color (#63B0BB) version of the Alpine Guide logo with Futura type font only.
- Ski Guides may use the black & white, or the light navy blue color (#003399), version of the Ski Guide logo with Futura type font only.
- Rock Guides may use the black & white, or the light red color (#ff3333), version of the Rock Guide logo with Futura type font only.
- Rock Instructors, Single-Pitch Instructors, Climbing Wall Instructor (Top Rope), and Climbing Wall Instructors (Lead) may only use the black & white version logo of their respective certification.

E-MAIL SIGNATURES

There are a variety of logoed e-mail signatures for members who would like to use the AMGA master brand logo with their respective certification specific logo(s). The approved e-mail signatures for members are pictured below.

ACCEPTABLE USE

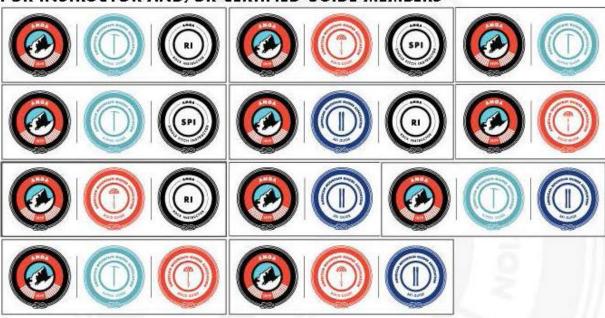
Email Signature logos may be used within the following guidelines:

- All Email Signatures must be used in an unaltered state.
- Use of Email signatures is restricted to print on business cards or electronically on bio page or email signature.
- The maximum pixel size of these signatures must be as follows: 2 logos 169x85, 3 logos -250x85, 4 logos 334x85, and 5 logos - 418x85.
- Only current, credentialed members who are in good standing, are permitted to use the
 email signature that correspond with the level of certification held by individuals.
- Email signatures should not be used in any way that could mislead the general public.

FOR INSTRUCTOR MEMBERS



FOR INSTRUCTOR AND/OR CERTIFIED GUIDE MEMBERS



AMERICAN MOUNTAIN GUIDE/IFMGA GUIDES



SUPPORTER LOGO FOR PAYING SUPPORTERS OF THE AMGA

The Supporter logo comes in the versions pictured below.





ACCEPTABLE USE

The Supporter logos are property of the American Mountain Guides Association and may only be used in an unaltered state with permission from the AMGA. The only sanctioned American Mountain Guides Association Supporter logos that can be used are the ones pictured and all other logo uses are prohibited.

Permission to use the Supporter logo is granted to the individuals and entities who are not actively working as guides, have not taken or enrolled in an AMGA program, who believe in the mission of the AMGA and who have joined the organization at the supporter level.

The Supporter logo is provided in Adobe Illustrator EPS (vector), Adobe Photoshop JPG, and PNG file formats. The supporter logo may be reproduced on print media, electronic media and social media. The AMGA is the only entity permitted to reproduce the Supporter logo on textile and use in published media.

AUTHORIZED USERS

The use of, promotion of the Supporter logo is granted to the following:

AMGA Supporters

UNACCEPTABLE USES

It is unacceptable to condense, extend, skew, distort, manipulate, modify or redraw the logo in any way. Use of the Supporter logo shall not mislead the public in any way.

COLOR AND STYLE

Pictured are the color variations in which our Supporter logo can be produced.

The primary colors for our logo are Pantone 419 (black), Pantone 7417C (red), Pantone 11-601TXC (white) and Pantone 7709C (blue). This is the required color combination and should be used for the color logo. It is acceptable to use the Pantone 419 (black) and 11-0601 TXC (white) logo, when technical or budgetary limitations prevent use of the colored version.

DEFINITION OF TERMS FOR TRAINING AND CERTIFICATION LEVELS

The following nomenclature is a way to appropriately represent yourself with your level of training and/or certification. These can be used in write-ups about yourself or e-mail signatures. Terms are NOT to be used in conjunction with AMGA trademarks.

- Instructor: An individual who has passed the Climbing Wall Instructor, Single Pitch Instructor
 Assessment or Rock Instructor Exam.
 - Example: An individual who has passed the Climbing Wall Instructor assessment is a Climbing Wall Instructor.
 - Example: An individual who has passed the Single Pitch Instructor assessment is a Single Pitch Instructor.
 - Example: An individual who has passed the Rock Instructor Exam is a Rock Instructor.
- Apprentice Guide: An individual who has taken one of the first level courses (Alpine Skills Course, Rock Guide Course, Alpine Guide Course, and Ski Guide Course).
 - Example: An individual who has successfully completed the Ski Guides Course is an Apprentice Ski Guide.
- Assistant Guide: An individual who has passed the exam component of an advanced level course.
 - Example an individual who has passed the Advanced Rock Guide Course and Aspirant Exam is an Assistant Rock Guide.
- Aspirant Mountain Guide: An individual who has passed the Aspirant Exam component
 of all three advanced level courses.
 - Example: an individual who has passed the Rock, Alpine and Ski Aspirant Exams is an Aspirant Mountain Guide.
- Certified Guide: An individual who has passed a full exam.
 - Example: an individual who has passed their Alpine Exam is an Alpine Guide.
 - Example: an individual who has passed their Rock Exam, Alpine Aspirant Exam and Ski Guide Course is a Rock Guide/Assistant Alpine Guide/Apprentice Ski Guide.
- American Mountain Guide/IFMGA Guide: Any guide who has passed all three AMGA guide level exams is an American Mountain Guide.

FAILURE TO ADHERE TO LOGO USE AND NOMENCLATURE POLICY

Those in violation of the AMGA Logo Use Policy will be given 30 days to rectify and remove any unauthorized use of the AMGA logos, names, or acronym, as well as, misleading text from any and all advertising. The AMGA office will notify the individual, partner, or industry affiliate via email or mail stating what must be done to rectify the situation.

Failure to comply with the AMGA Brand Use Policy and directives from the AMGA office or Board of Directors within 30 days of receiving notification may result in the loss of membership, credential, Accreditation, or may result in legal action. The AMGA takes the logo use policy very seriously and necessary precautions and actions will be taken to protect the AMGA trademarks and brand.



SCOPE OF PRACTICE

Approved April 7, 2017 Revised September 21, 2021

Note: The American Mountain Guide Association (the "AMGA") Scope of Practice (the "SOP") applies to all AMGA Professional Members and AMGA Accredited Businesses.

Introduction

The AMGA believes that all professional members and accredited businesses should operate under clearly defined minimum standards. The primary goal of SOP is to support and promote safety, quality of experience, and the public interest by establishing training and certification standards for the AMGA community (professional members and accredited businesses). Furthermore, the SOP will elevate the guiding profession and allow the AMGA to better promote guiding and instruction to the public, clients, land management agencies, and others in the community.

The SOP framework defines appropriate guiding roles and supervision needs for professional members at all levels of training and certification. It is the responsibility of all AMGA professional members and accredited businesses to familiarize themselves with the SOP and make every effort to comply with these standards. Guides and accredited businesses should, however, recognize that these are normally minimum standards. Each guiding role has unique demands and additional experience, skills, and mentorship beyond that described in the SOP maybe appropriate.

The AMGA acknowledges that there are multiple approaches to training/guiding that will not fall into strict compliance with the guidelines of the SOP. These alternative courses and programs are not necessarily less appropriate than those that do comply with the requirements of the SOP; however, the AMGA believes that the consistency and quality encouraged by the SOP structure is important to the reputation and growth of the organization. Nevertheless, no training or certification structure, including SOP, can provide a guarantee of safety given the inherent and other risks associated with climbing and skiing. Further, given variables in terrain and weather beyond the control of the AMGA instructor/guide, deviations from the SOP may be justifiable.

This document is intended to be utilized by AMGA professional members and accredited businesses. In addition, this document does not attempt to describe types of avalanche terrain that may be encountered in Ice Instructor, Alpine Guide, and Ski Guide terrain. Guides in potential avalanche terrain must rely on their avalanche training, obtained outside the AMGA, for the identification and understanding of aid terrain.

Until July 1st, 2022, this document is educational for AMGA accredited businesses and AMGA professional members (except SPI providers, for whom this is a condition of their contract beginning January 1st, 2018). After July 1st, 2022, compliance is mandatory for AMGA accredited businesses and AMGA professional members. See section VIII, Implementation and Enforcement, for complete details on these topics. (This paragraph to be removed after 7/1/22.)

I. Definition of Terms for Supervision and Mentoring

Guide: While, technically, there are differences between guiding and instructing climbing, for the sake of simplicity the term "Guide" will be used interchangeably throughout this SOP to identify guides and instructors, both certified and working through the AMGA training progression.

Tenured Guide: A Tenured Guide is a Guide working for an AMGA accredited business who was hired by that business before January 1, 2008, and who has continued to work for an accredited business since that date. A Tenured Guide who accepts work with a different accredited business is only tenured in similar terrain to that which they guided in previously. Tenured Guides are exempted from this SOP, but, as identified below, are encouraged to engage in the Supervision and Mentoring of Guides in training. Tenured Guide status as described applies only within the AMGA accredited business employing that Guide, any exception requires approval in advance by the AMGA Technical Director.

Unsupervised: Guides who are AMGA certified or trained for the terrain in which they work or who are Tenured Guides may work independently, without a Supervisor as identified for the various disciplines below.

Supervision: Supervision is a working relationship between Guides certified by the AMGA in a given terrain type or Tenured Guides and Guides in training for that terrain. Supervision implies working in close proximity during a given activity, such as two rope teams traveling near each other on a glacier or near each other on multi-pitch routes. Supervision includes periodic briefings and debriefings about route selection, strategy, and client care. Throughout a supervised activity, the supervised Guide and their supervisor may be out of sight of each other and may or may not (as feasible) be in radio or phone contact.

Supervisors: Supervisors are Guides who are certified by the AMGA for the terrain in which they work or Tenured Guides who have undertaken a supervisory role for that terrain — individually or within a company.

Mentoring: Mentoring is an informal, voluntary relationship between a more experienced Guide and one with less experience. It is a learning and development partnership between a Guide with significant experience and someone who wants to learn. Mentoring often includes informal communication, in person or otherwise, over an extended period of time to assist in an individual's professional development.

Mentors: Mentors are typically individuals who are certified by the AMGA for the terrain in which they work, Assistant Guides (as defined below), or Tenured Guides. Mentors should have a depth of experience and knowledge of the terrain in which they work, but just as important, should also possess a willingness to share their knowledge in a way that advances the guiding profession and the abilities of the individuals with whom they work.

II. Supervision and Mentoring

Mentoring and Supervision are critical components of an individual's AMGA continuing training ("Apprenticeship"). Apprenticeship is considered by the AMGA as important to the development of the many skills that often cannot be completely addressed in a formal training system. Because of this, the AMGA relies on AMGA accredited businesses, Mentors, and Supervisors to provide Apprenticeship. It is imperative that accredited businesses, Mentors, and Supervisors thoughtfully consider their role and determine whether they have the appropriate mindset, tools, and skills to provide effective Apprenticeship.

III. Definition of Terms for AMGA Training and Certification Levels

Instructor: An individual who has passed the Climbing Wall Instructor Certification Course, Single Pitch Instructor Assessment, Rock Instructor Exam, Multi-Pitch Instructor Course and Exam, or Ice Instructor Exam.

<u>Example</u>: An individual who has passed the Climbing Wall Instructor Certification Course is a Climbing Wall Instructor. An individual who has passed the Single Pitch Instructor assessment is a Single Pitch Instructor. An individual who has passed the Multi-Pitch Instructor Course and Exam is a Multi-Pitch Instructor. An individual who has passed the Rock Instructor Exam is a Rock Instructor.

Apprentice Guide: An individual who has successfully completed any first level course (Alpine Skills Course, Rock Guide Course, Alpine Guide Course, or Ski Guide Course).

<u>Example</u>: An individual who has successfully completed the Ski Guide Course is an Apprentice Ski Guide.

<u>Note</u>: An individual who has successfully completed the Alpine Skills Course is an Apprentice Guide, but needs to work under Supervision.

Assistant Guide: An individual who has passed the exam component of an advanced level course.

<u>Example</u>: An individual who has passed the Advanced Rock Guide Course and Aspirant Exam is an Assistant Rock Guide.

Aspirant Mountain Guide: An individual who has passed the Aspirant Exam component of all three advanced level courses.

<u>Example</u>: An individual who has passed the Rock, Alpine, and Ski Aspirant Exams is an Aspirant Guide.

Certified Guide: An individual who has passed a Guide level Exam (Alpine, Rock, or Ski).

<u>Example</u>: An individual who has passed their Alpine Exam is an Alpine Guide. An individual who has passed their Rock Exam, Alpine Aspirant Exam, and Ski Guide Course is a Rock Guide/Assistant Alpine Guide/Apprentice Ski Guide.

American Mountain Guide/IFMGA Guide: Any Guide who has passed all three Guide level exams is an American Mountain Guide.

IV. Definition of Remote Terrain

Remote Terrain: Remote Terrain is defined as terrain with significant and/or complex approaches and descents, typically requiring two or more hours from the trailhead. Access to definitive medical care will be significantly delayed. Remote Terrain may be approached and descended in one day as on a significant rock, alpine, or ski objective, or it may involve less demanding routes where backcountry camping is involved.

V. Terrain, Supervision, and Mentoring

Terrain Types:

Terrain for Guides is defined based on these categories:

- Climbing Wall Instructor
- Single Pitch Instructor
- Multi-Pitch Instructor
- Rock Instructor
- Ice Instructor
- Rock Guide
- Glacier Guide
- Alpine Guide
- Ski Guide

Terrain Descriptions:

These descriptions are further clarified by the <u>draft AMGA Route Catalog</u> which contains commonly guided climbs from around the United States including specifics on required training and certification levels for guiding each route.

Climbing Wall Instructor Terrain:

Climbing Wall Instructor terrain is indoor or outdoor artificial climbing structures designed specifically for rock climbing activities. There are two AMGA certification levels for this terrain: Lead Climbing Wall Instructor and Top Rope Climbing Wall Instructor.

<u>Top Rope Climbing Wall Instructors</u> are eligible to teach climbing movement and top rope climbing skills instruction on artificial climbing structures.

<u>Lead Climbing Wall Instructors</u> are eligible to teach lead climbing skills on single pitch artificial climbing structures in addition to the skills taught by Top Rope Climbing Wall Instructors.

Neither certified Lead nor Top Rope Climbing Wall Instructors have been certified to teach climbing on naturally occurring rock formations.

Single Pitch Instructor Terrain:

Single Pitch Instructor terrain is outdoor terrain up to Grade I, that is climbed without intermediate belays. Approaches and descents to and from climbing venues present no difficulties such as significant route finding, scrambling, or short roping. The routes should not exceed Grade I or be more than one pitch in length.

Single Pitch Instructor Supervision and Mentoring

- Single Pitch Instructors, Multi-Pitch Instructors, Rock Instructors, Apprentice Rock Guides, Assistant Rock Guides, Rock Guides, Apprentice Alpine Guides (excepting Alpine Skills Course Graduates), Assistant Alpine Guides, Alpine Guides, IFMGA Guides, and Tenured Guides can work <u>Unsupervised</u> in this terrain.
- Graduates of the Single Pitch Instructor Course or Alpine Skills Course can work under the <u>Supervision</u> of a Single Pitch Instructor, Multi-Pitch Instructor, Rock Instructor, Rock Guide, IFMGA Guide, or Tenured Guide.
- Mentors for this terrain are Rock Instructors, Multi-Pitch Instructors, Rock Guides, IFMGA Guides, and Tenured Guides.

Multi-Pitch Instructor Terrain:

Multi-Pitch Instructor terrain is outdoor terrain that is not Remote Terrain, up to 400' in length with approaches and descents that require minimal short roping. The approach and/or descent should have only short sections of Class 3 and/or Class 4 terrain that does not require movement on snow which would create a falling hazard. The routes should not exceed 400' in length.

Multi-Pitch Instructor Supervision and Mentoring

- Multi-Pitch Instructors, Rock Instructors, Assistant Rock Guides, Rock Guides, IFMGA Guides, and Tenured Guides can work <u>Unsupervised</u> in this terrain.
- Multi-Pitch Instructors and Apprentice Rock Guides can work <u>Unsupervised</u> on routes up to Grade II and under <u>Supervision</u> of a Rock Guide, IFMGA Guide, or Tenured Guide on routes up to Grade III.
- Mentors for this terrain are Multi-Pitch Instructors, Rock Instructors, Assistant Rock Guides, Rock Guides, IFMGA Guides, and Tenured Guides.

Rock Instructor Terrain:

Rock Instructor terrain is outdoor terrain that is not Remote Terrain, up to Grade III, with approaches and descents that require minimal short roping. The approach and/or descent should have only short sections of Class 3 and/or Class 4 terrain that does not require movement on snow which would create a falling hazard. The routes should not exceed Grade III in length.

Rock Instructor Supervision and Mentoring

- Rock Instructors, Assistant Rock Guides, Rock Guides, IFMGA Guides, and Tenured Guides can work <u>Unsupervised</u> in this terrain.
- Multi-Pitch Instructors and Apprentice Rock Guides can work <u>Unsupervised</u> on routes up to Grade II and under <u>Supervision</u> of a Rock Guide, IFMGA Guide, or Tenured Guide on routes up to Grade III.
- Mentors for this terrain are Assistant Rock Guides, Rock Guides, IFMGA Guides, and Tenured Guides.

Ice Instructor Terrain:

<u>Single Pitch Ice Instructor</u> terrain is outdoor terrain that is not Remote Terrain and has approaches with no short roping. Objective hazards such as avalanche and icefall should be minimized by practicing terrain avoidance.

<u>Multi-Pitch Ice Instructor</u> terrain is not Remote Terrain, up to Grade III, with approaches and descents that require minimal short roping. The approach and/or descents should have only short sections of low angle ice or other hazards that require minimal management. The routes should be no longer than 3-4 pitches.

Ice Instructor Supervision and Mentoring - In Single Pitch Ice Terrain

- Ice Instructors, Assistant Alpine Guides, Alpine Guides, IFMGA Guides, and Tenured Guides can work <u>Unsupervised</u> in this terrain.
- Graduates of the Ice Instructor Course can work <u>Unsupervised</u> in this terrain.
- Single Pitch Instructors, Multi-Pitch Instructors, Rock Instructors, Rock Guides, Apprentice and Assistant Rock Guides, Apprentice Alpine Guides, can work under <u>Supervision</u> of an Ice Instructor, Assistant Alpine Guide, Alpine Guide, IFMGA Guide, or Tenured Guide on single pitch terrain where they do not lead.
- Mentors for this terrain are Ice Instructors, Alpine Guides, IFMGA Guides, and Tenured Guides.

Ice Instructor Supervision and Mentoring - In Multi-Pitch Ice Terrain

- Ice Instructors, Alpine Guides, Assistant Alpine Guides, IFMGA Guides, Rock Guides who are a graduate of the Ice Instructor Course, and Tenured Guides can work <u>Unsupervised</u> in this terrain.
- Multi-Pitch Instructors and Rock Instructors who are graduates of the Ice Instructor Course can work <u>Unsupervised</u> on routes up to Grade II.
- Apprentice Alpine Guides who are also graduates of the Ice Instructor Course can work <u>Unsupervised</u> on routes up to Grade II.
- Mentors for this terrain are Alpine Guides, IFMGA Guides, and Tenured Guides.
- Guides/Instructors on multi-pitch ice routes that have significant avalanche terrain should have Professional Avalanche Training 1 (Pro 1) or Avalanche Level 2 training (prior to 2018).

Rock Guide Terrain:

Rock Guide terrain includes Rock Instructor terrain and Remote Terrain, at any commitment grade, with approaches and descents that require substantial short-roping. The approach and/or descent should not require movement on snow or ice that creates a falling hazard. Rock Guides, excepting those who are qualified through the Alpine Guide track, should refrain from guiding in terrain where the preponderance of the climbing is 3rd and 4th class and is alpine in nature – terrain that is more akin to Alpine Guide terrain.

Rock Guide Supervision and Mentoring

- Rock Guides, IFMGA Guides, and Tenured Guides can work <u>Unsupervised</u> in this terrain.
- Graduates of the Ice Instructor Course can work <u>Unsupervised</u> in this terrain.
- Single Pitch Instructors, Multi-Pitch Instructors, Rock Instructors, Rock Guides, Apprentice and Assistant Rock Guides, Apprentice Alpine Guides, can work under <u>Supervision</u> of an Ice Instructor, Assistant Alpine Guide, Alpine Guide, IFMGA Guide, or Tenured Guide on single pitch terrain where they do not lead.
- Mentors for this terrain are Ice Instructors, Alpine Guides, IFMGA Guides, and Tenured Guides.

Glacier Guide Terrain:

Glacier Guide terrain is primarily glaciated and can be Remote Terrain (expeditionary) up to Grade IV with approaches and descents that may include snow, ice, and glaciated terrain. The routes can have long and complex approaches that do not involve long complex sections of short roping in 3rd and 4th class and with no steps of 5th class rock or sustained ice climbing. Glacier Guides, excepting those who are also qualified through the Rock Guide Track and Ice Instructor course graduates, should refrain from pitched sections of ice or rock that are more akin to multipitch rock or ice terrain.

Glacier Guide Supervision and Mentoring

- Glacier Guides, Assistant Alpine Guides, Alpine Guides, IFMGA Guides, and Tenured Guides can work <u>Unsupervised</u> in this terrain.
- Apprentice Alpine Guides can work under <u>Supervision</u> of Glacier Guides, Assistant Alpine Guide, Alpine Guide, IFMGA Guide, or Tenured Guide for glacier specific routes up to Alpine Grade IV.
- Graduates of the Alpine Skills Course can work under <u>Supervision</u> of a Glacier Guide, Assistant Alpine Guide, Alpine Guide, IFMGA Guide, or Tenured Guide for glacier specific routes up to Alpine Grade II.
- Mentors for this terrain are Glacier Guides, Alpine Guides, IFMGA Guides, and Tenured Guides.

Alpine Guide Terrain:

Alpine Guide terrain includes Rock Instructor terrain and Remote Terrain, up to alpine Grade V, with approaches and descents that may include snow, ice, and glaciated terrain. The routes can be long and complex with the majority of the terrain being 3rd and 4th class with significant steps

of 5th class. Alpine Guides, excepting those who are qualified through the Rock Guide track, should refrain from guiding long sections of high standard 5th class climbing — terrain that is more akin to Rock Guide terrain.

Alpine Guide Supervision and Mentoring

- Alpine Guides, IFMGA Guides, and Tenured Guides can work <u>Unsupervised</u> in this terrain.
- Assistant Alpine Guides can work **Unsupervised** for routes up to Alpine Grade IV.
- Apprentice Alpine Guides can work <u>Unsupervised</u> for routes up to Alpine Grade III without significant ice climbing.
- Apprentice Alpine Guides who have also completed the Ice Instructor Course can work <u>Unsupervised</u> for routes up to Alpine Grade III with significant alpine ice climbing.
- Apprentice Alpine Guides can work under <u>Supervision</u> of an Alpine Guide, IFMGA Guide, or Tenured Guide for routes up to Alpine Grade IV.
- Graduates of the Alpine Skills Course can work under <u>Supervision</u> of an Assistant Alpine Guide, Alpine Guide, IFMGA Guide, or Tenured Guide for routes up to Alpine Grade II.
- Mentors for this terrain are Alpine Guides, IFMGA Guides, and Tenured Guides.

Ski Guide Terrain:

Ski Guide terrain includes Remote Terrain, glaciated, and non-glaciated terrain, ascents and descents that may involve short roping on moderate rock and ice terrain. Ski Guides, excepting those who are qualified through the Alpine Guide track, should refrain from short roping on difficult rock and ice terrain — terrain that is more akin to Alpine Guide terrain.

Ski Guide Supervision and Mentoring

- Alpine Guides, IFMGA Guides, and Tenured Guides can work <u>Unsupervised</u> in this terrain.
- Assistant Alpine Guides can work <u>Unsupervised</u> for routes up to Alpine Grade IV.
- Apprentice Alpine Guides can work <u>Unsupervised</u> for routes up to Alpine Grade III without significant ice climbing.
- Apprentice Alpine Guides who have also completed the Ice Instructor Course can work <u>Unsupervised</u> for routes up to Alpine Grade III with significant alpine ice climbing.
- Apprentice Alpine Guides can work under <u>Supervision</u> of an Alpine Guide, IFMGA Guide, or Tenured Guide for routes up to Alpine Grade IV.
- Graduates of the Alpine Skills Course can work under <u>Supervision</u> of an Assistant Alpine Guide, Alpine Guide, IFMGA Guide, or Tenured Guide for routes up to Alpine Grade II.
- Mentors for this terrain are Alpine Guides, IFMGA Guides, and Tenured Guides.

VI. In-House Training

AMGA courses are considered the baseline technical training for specific terrain types. In-house training and/or Mentoring is a means of preparing Guides to meet the specific operational needs of a business. In-house training or Mentoring, in conjunction with AMGA training and certification, may serve to develop well-rounded and competent Guides and employees.

VII. Clarifications, Variances, and Edits to this Document

Clarifications:

Situations may arise where the terrain or other descriptions may not provide adequate detail to appropriately apply the SOP. If such a question arises, an AMGA professional member, accredited business, or other stakeholder may request a clarification.

- Clarifications will be issued by the Technical Director ("TD") or an individual designated by the TD or they may defer action until the next meeting of the AMGA Board
- Clarifications issued by the Technical Director will be reviewed by a committee appointed by the AMGA Board
- The Board appointed committee may revise or rescind the TD's clarification as it sees fit,
 the AMGA Board of Directors will be informed of and may modify the committee's actions
- Clarifications approved by the Board will be listed on the AMGA website

Variances:

As mentioned in the introduction to this document, Guides in the field may find themselves in situations where deviation from the SOP is unavoidable. Professional members, accredited businesses, or outdoor education organizations may also anticipate situations in advance where working outside the SOP is difficult to avoid. The AMGA will consider issuing a variance to the member, accredited business, or outdoor education organization so that, in defined situations, work outside of the SOP is permissible.

- Variances will be issued by the Technical Director ("TD") or an individual designated by the TD
- The applicant must demonstrate a need that is not able to be fulfilled without a variance
- Variances issued or denied by the TD will be reviewed by a committee appointed by the AMGA Board of Directors
- The Board appointed committee may revise or rescind the TD's clarification as it sees fit, the AMGA Board of Directors will be informed of and may modify the committee's actions
- Variances for non-accredited organizations will only be issued to organizations (or individual AMGA members working at an organization) whose primary focus/ mission is education and not a guiding business
- Non-accredited organizations granted a variance must have an internal staff training process for the relevant terrain and a risk management plan
- The AMGA Board of Directors may approve detailed guidelines to be used in granting variances

Edits:

It is the objective of the AMGA that the general intent of this document will remain unchanged. The goal is to provide consistent guidance to AMGA members and accredited businesses. It is recognized, however, that infrequent clarifications or adjustments on terrain descriptions, training levels, Supervision, Mentorship, or other topics may be necessary. The AMGA Board of Directors will consider these edits as needed.

VIII. Implementation & Enforcement (this section to be removed after July 1, 2022)

Initially the SOP will be a fundamental component of all AMGA educational programs with the intent of clearly educating students with respect to the specific terrain and skills for which the students will be trained. This information will also be available to the guided/instructed public. The SOP will be an educational document with no formal enforcement mechanism until its adoption becomes mandatory.

As of July 1, 2022, the SOP will be mandatory for AMGA professional members and accredited businesses. SOP compliance will be recommended for Single Pitch Instructor Course Providers beginning in 2017 and be required as a condition of their contract in 2018. The SOP will establish the scope of work for members at all training/certification levels, and it will also be accompanied by an enforcement mechanism developed by the Professional Compliance Committee ("PCC") and approved by the AMGA Board of Directors. This enforcement mechanism will include procedures for evaluating deviations from the SOP, recommendations for compliance, and where appropriate, sanctions.

Accredited Businesses:

For accredited businesses, the following is a suggested timetable that may assist with implementation of SOP by steadily increasing the percentage of Guides operating within SOP:

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January 1, 2018 - 60%
January 1, 2019 - 70%
January 1, 2020 - 80%
January 1, 2021 - 90%
July 1, 2022 - 100% (mandatory)
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This suggested timetable will be distributed to all AMGA accredited businesses and any businesses interested in seeking accreditation. This suggested timetable is for accredited businesses only and does not apply to individual guides.

Appendix: Avalanche Education

In the 2017/18 winter season the American Avalanche Association (AAA) implemented changes to the Avalanche Education system in the United States. For details on the updated avalanche education framework and additional information please click here.