

AAMC POLICIES AND PROCEDURES FOR INVESTIGATING REPORTED VIOLATIONS OF INTERNSHIP/RESIDENCY/FELLOWSHIP APPLICATION STANDARDS

PURPOSE

FindAResident[®], a service of the Association of American Medical Colleges (AAMC), strives to promote integrity in the application processes associated with entry into physician training programs, and to encourage high standards during the course of application submission. The policies and procedures, defined under the FindAResident Integrity Promotion Program, have been developed to advance this purpose by addressing suspected dishonest application activity which may arise while ensuring the rights of all concerned parties.

POLICIES

FindAResident requires applicants to provide complete, accurate and current information when submitting their application information and during all phases of the application process for physician training programs. It is the policy of FindAResident to investigate discrepancies in the application information submitted by the applicant to attempt to subvert the application process; and any other irregularities which may occur in connection with application activities.

Reporting of Investigation Findings

FindAResident will prepare and issue a report documenting the nature of a confirmed case and any attachments provided by the individual in accordance with the procedures outlined below. With the issuance of a report, FindAResident makes no judgment as to the culpability of any person with respect to matters reported and does not assess the suitability of an individual to study or practice medicine. Rather, FindAResident strives to communicate complete and accurate information to legitimately interested parties. Evaluation of this information is the responsibility of the recipient of the report.

PROCEDURES

Investigation Proceedings

Applicants and training programs using FindAResident may report suspected violations of the FindAResident Integrity Policy. Violations and all communications relevant to an investigation must be sent in writing to:

Nancy Ortiz
FindAResident Manager
2450 N Street N.W.
Washington, DC 20037
Fax: (202) 828-1129
E-mail: findaresident@aamc.org

FindAResident will contact the applicant and any other parties named in the complaint as well as others who may have knowledge relevant to the suspected violation. These parties will be asked to provide a statement providing information from their perspective relating to the activity under review.

The applicant named in the complaint is informed of the launch of the investigation. The individual is also given an opportunity to review the *Preliminary Report* proposed for distribution to interested parties prior to issuance; and is offered an opportunity to respond to the allegation(s). Unless otherwise requested, the *Final Report* will include any explanation or justification provided by the applicant during the course of the investigation.

Every effort is made to investigate any allegation(s) in a timely manner while ensuring accuracy and completeness of the *Final Report*; however, a pending investigation may interrupt the processing of application materials with questionable validity.

The Appeals Process

Prior to the issuance of a final report that a violation has, in fact, occurred, the AAMC offers the option and reserves the right to request arbitration for the following reasons:

1. The applicant concludes that the Preliminary Report unfairly characterizes the matter under investigation; or
2. An agreement between parties on the content and language of the report cannot be reached.

Arbitration must be requested prior to the conclusion of an investigation and the issuance of the Final Report. Arbitration shall be conducted by a neutral arbitrator selected by the American Arbitration Association in Washington, DC. The arbitrator acts solely on the basis of a written record submitted by both parties, and no hearings or oral arguments are held.

The arbitrator will have final authority to conclude whether: (1) the report should be distributed as written; or, (2) the report should be modified in accordance with the arbitrator's directions before distribution; or, (3) no report should be distributed. In addition, the arbitrator determines which party is responsible for the arbitration fee. All other costs associated with arbitration are borne by the party incurring them.

Final Report Recipients

The report in final form will be issued to the applicant and all physician training programs to which the individual applied or matriculated during the current cycle. Physician training programs to which the applicant applies in the future through FindAResident will be alerted to a violation report on file for the applicant.

Payment of FindAResident Fees

An investigation initiated by FindAResident resulting from a claim of fraudulent application activity does not relieve the applicant of the responsibility for payment of all FindAResident processing fees. No refunds will be given for application materials transmitted through the FindAResident system, regardless of the outcome of an investigation.

CONSEQUENCES OF CONFIRMED VIOLATION OF THE FINDARESIDENT INTEGRITY PROMOTION POLICY

When the findings of a FindAResident investigation reveal that there has been a violation of the FindAResident Integrity Promotion Policy by an applicant, the following shall occur:

1. The *Final Report*, including the applicant's response if appropriate, will be delivered to:
 - a. The FindAResident applicant accused of the violation.
 - b. Residency or fellowship program staff participating in FindAResident during the season in which the violation was committed.
 - c. Upon request to residency or fellowship program staff participating in FindAResident for subsequent seasons for which the applicant has registered and paid the FindAResident subscription fee.
2. The applicant will be indicated as a violator within the FindAResident system, visible to residency and fellowship program staff, with a notation that further information about the violation may be requested at which time the *Final Report* would be sent to the program contact.
3. The *Final Report* will be distributed to the ERAS—Electronic Residency Application Service, a sister program of FindAResident, and a product of the AAMC, for distribution to every training program to which the applicant applies using ERAS in the current application season as well as any subsequent seasons.

NOTICES

Any notice or other communications required by this policy shall be in writing, and shall be delivered to the physical address and/or electronic mail address provided in the FindAResident application or FindAResident database system. The communications shall be sent either by regular USPS mail, certified mail, return receipt requested, express mail or electronic mail (e-mail), as determined by FindAResident. Notices are deemed received when indicated by appropriate tracking systems. E-mail transmission will be deemed received when sent and no return notice is received back to FindAResident.