

## **NATIONAL RESIDENT MATCHING PROGRAM SANCTIONS GUIDELINES**

### **Overview**

The National Resident Matching Program ("NRMP") requires that all participants in the NRMP's Matching Program sign a Match Participation Agreement (the "Match Agreement"). In order to insure an efficient, fair, and orderly matching process, the Match Agreement authorizes the NRMP to impose sanctions in the event a participant in the Matching Program violates the Match Agreement.

It is the NRMP's objective to apply the sanctions authorized in the Match Agreement in an equitable and consistent manner. The NRMP's Violations Review Committee ("VRC"), with input from NRMP staff, has prepared the following set of guidelines that should be used in cases where sanctions are imposed. Imposition of sanctions as set forth in the guidelines is not mandatory. The NRMP staff and VRC Review Panel members may exercise their discretion in imposing sanctions, taking into account the specific facts of each case, but should attempt to do so in a manner consistent with these guidelines.

### **Sanctions Guidelines**

The guidelines to be followed when sanctions are imposed for violations of the Match Agreement are set forth in the Sanctions Guidelines Table attached hereto.

### **Violations That Are Intentional or That Involve Deceptive or Dishonest Conduct.**

The NRMP requires Matching Program participants to behave with the highest ethical and professional standards. Violations of the Agreement that are intentional or that involve deceptive or dishonest conduct are considered the most egregious violations, and justify the most severe sanctions, including a permanent ban from the Matching Program.

### **Factors**

Under the Sanctions Guidelines, there are certain factors the NRMP may take into account when considering sanctions. Those factors include, but are not necessarily limited to, the nature of the violation, the egregiousness of the violation (e.g. questionable ethics and professionalism, fraud), failure to follow established procedures, whether the violation is intentional, any significant hardship of the participant that relates to the violation, and the impact of the violation on the Matching Program and/or on any other participant of the Program.

Repeated violations or persistent disregard of NRMP communications may be considered an aggravated factor that warrants more severe sanctions.

### **Deviation From Guidelines**

The NRMP has full discretion to deviate from the guidelines set forth in the Sanctions Guidelines Table if the Review Panel members unanimously agree that a deviation is warranted. The basis for any deviation does not need to be included in the Review Panel Report or Final Report.

<u>Sanction</u>	<u>1 Year</u>	<u>2 Years</u>	<u>3 Years</u>	<u>Permanent</u>
Bar from participating in SOAP for the Main Residency Match	Applied against any applicant who violates the SOAP communications policies in the Main Residency Match Agreement.	NA	NA	NA
Bar from accepting or starting a position in any program sponsored by an NRMP Match-participating institution (applicants only)	Applied against any applicant who violates the relevant Match Agreement. The NRMP, in its discretion, may withhold this sanction if it believes mitigating circumstances justify a lesser sanction.	NA	NA	NA
Bar from participating in the NRMP Matching Program	Applied against any participant who violates the relevant Match Agreement. The NRMP, in its discretion, may withhold this sanction if it believes mitigating circumstances justify a lesser sanction. Repeat violators of <b>SOAP</b> polices may be barred from the Match.	Applied against any participant who violates the relevant Match Agreement if the NRMP obtains evidence that the participant recklessly or intentionally disregarded or failed to comply with NRMP policies or procedures. The NRMP, in its discretion, may reduce this sanction if it believes mitigating circumstances justify a lesser sanction.	Applied against any participant who violates the relevant Match Agreement if the NRMP obtains evidence that the participant recklessly or intentionally disregarded or failed to comply with NRMP policies or procedures and disadvantaged other interested parties. The NRMP, in its discretion, may reduce this sanction if it believes mitigating circumstances justify a lesser sanction.	Applied against any participant who violates the relevant Match Agreement wherein the violation involves gross misconduct and/or a fraudulent misrepresentation by a Match participant that the NRMP believes materially bears on the professionalism, truthfulness, and integrity of the participant.
Identification as a Match violator in the R3 system.	Applied for all violations of the relevant Match Agreement.	Applied against any participant who violates the relevant Match Agreement if the NRMP obtains evidence that the applicant recklessly or intentionally disregarded or failed to comply with NRMP policies and procedures. The NRMP, in its discretion, may increase this sanction if it believes mitigating circumstances justify a greater sanction.	Applied against any participant who violates the relevant Match Agreement if the NRMP obtains evidence that the participant recklessly or intentionally disregarded or failed to comply with NRMP policies or procedures and disadvantaged other interested parties. The NRMP, in its discretion, may increase this sanction if it believes mitigating circumstances justify a greater sanction.	Applied against any participant who violates the relevant Match Agreement wherein the violation involves gross misconduct and/or a fraudulent misrepresentation by a Match participant that the NRMP believes materially bears on the professionalism, truthfulness, and integrity of the participant.