



OTA Fellowship Compliance Guidelines

Guidelines

- 1 A Sub-committee of the Fellowship Committee was originally formed to recommend the penalties for non-compliance with the match. This sub-committee has assumed an expanded role as the Fellowship Compliance Committee. Their role is to investigate and recommend penalties for non-compliance with the fellowship match and fellowship training experience based upon the recommendations and guidelines established by the Fellowship Committee.
- 2 Participating programs will be required to make all of their positions available through the match.
- 3 Participating programs will have their programs listed on the OTA website and be allowed to participate in the current online application process.
- 4 Unless otherwise specified, the standards, guidelines and responsibilities for applicants will be those posted by the SF match.
- 5 Unless otherwise specified, the standards, guidelines and responsibilities for programs will be those approved by OTA.
- 6 Participating programs are expected to offer an educational experience encompassing the depth and breadth of experience as recommended by the fellowship committee.

Reporting of Violations

- 1 Reports of noncompliance should be submitted in writing to the OTA Business Office, and may come from:
 - a. Applicants
 - b. Other Programs
 - c. Faculty within a violating program seeking immunity
 - d. Individuals reporting noncompliance may choose to remain anonymous to the extent that this is possible
- 2 Complaints from candidates and fellows will be filed through the compliance committee first whereas complaints from programs will begin with the fellowship committee.
 - a. Most complaints will require the involvement of both the fellowship and compliance committees
 - b. If it is unclear which committee is most appropriate to investigate initially the chairs of these 2 committees will determine how best to proceed.
- 3 Complaints will be investigated through personal interviews and the collection of written statement.
- 4 Programs are encouraged to proactively report potential concerns to avoid penalties and develop solutions, examples include:
 - a. Potential match irregularities
 - i. See section below on anticipated match irregularities
 - b. Faculty changes that could impact compliance
- 5 Committee decisions may be appealed to the President Elect of the OTA.

Penalties for Programs

Programs found to be in default of the guidelines may be subject to Adverse Actions as noted in the OTA Fellowship Program Requirements

OTA Fellowship Compliance Committee Guidelines for anticipated Match Irregularities

1. Programs are expected to participate in the fellowship match process in good faith
2. Occasionally there may be a unique circumstance where a program or candidate may desire to limit their application pool. Examples include:
 - a. Geographical limitations to the candidate that necessitate limiting application to a specific program
 - b. Programs having a past experience with a specific candidate that they are certain will be their first choice
 - c. Oftentimes a combination of the above 2 situations
3. In these cases, programs are encouraged to report what will be an irregularity in the match.
 - a. Programs cannot accept applications, with their associated costs, in good faith if the position is unlikely to be available or a candidate is already selected for the position.
 - b. In this unique circumstance, a program may report that they are limiting their candidates to a single individual for that year.
 - i. It is expected that this will be reported prior to the application deadline for the SF match so other candidates will not be charged application fees
 - ii. The program should apply for an exemption through the compliance committee
 - iii. The program will not participate in the SF match but will reach out to SF Match and have this data manually entered in the note section of their database profile.

This is for record keeping purposes for both SF Match and OTA.

 1. The program cannot require that the applicant limit their applications to their program only, e.g., the program assumes the risk of not matching in this circumstance
 2. The SF match will be notified ahead of time to prevent others from applying to the position and being charged application fees
4. A program may not report an anticipated match irregularity more often than once every 5 years
 - a. This should be a unique circumstance and not become a way to circumvent the match
 - b. This will be tracked through the OTA business office and the compliance and fellowship committees