

Month Day, Year

Director XX

{State} Department of XX

Street Address

City, State Zip Code

Re: Concerns Regarding “Diploma Mills”

Dear Director XX,

On behalf of the American Osteopathic Association (AOA) and the X undersigned osteopathic specialty and state associations, collectively representing over 207,000 osteopathic physicians (DOs) and osteopathic medical students (OMSs) nationwide, we write today to bring your attention to a concerning issue which has implications for the integrity of higher education, state and federal consumer protections, and public trust in the medical professions.

In recent months, our organizations have become aware of an increase in third-party entities marketing so-called “degree conversion” services (also known as diploma mills) to licensed physicians. These organizations claim, often through unsolicited outreach and online advertising, that a Doctor of Osteopathic Medicine (DO) degree may be “converted” into a Doctor of Medicine (MD) degree, or vice versa, by simply paying a fee to the organization, without the recipient completing the standardized and accredited educational pathway leading to the other degree.

Unfortunately, many state laws do not actually prevent a physician of one educational background from claiming the other degree (i.e. “John Smith, MD, DO” or “John Smith, DO, MD”). The law may state, for example, “a person who is licensed by the state medical board and who holds a doctor of medicine degree shall use ‘physician and surgeon,’ ‘MD,’ etc.,” without prohibiting them from *additionally* using the DO degree, and vice versa. Unscrupulous individuals have taken note and are now exploiting these ambiguities for their own financial gain, raising serious concerns within the medical community about higher education oversight, healthcare truth in advertising, and public transparency.

By way of additional background, DO and MD physicians do complete similar education and training (as outlined below) – *which is equivalently rigorous but contains several important differences* – before they become eligible for unlimited medical licensure as *either* a DO or an MD in all 50 states:

- Four years of medical school, comprised of two years of didactic study followed by two years of clinical rotations done in community hospitals, major medical centers, and doctors’ offices;
 - *NOTE: MD-granting medical schools are accredited by the Liaison Committee on Medical Education (LCME), and DO-granting schools are accredited by the Commission on Osteopathic College Accreditation (COCA). Both organizations are recognized as setting the standards necessary for competent practice as either an MD or as a DO, respectively, by the US Department of Education.*
 - *As part of their COCA-accredited education, DOs complete 200+ hours of training in osteopathic principles and practice that MD students do not complete, which enables DOs to safely treat patients using hands-on modalities*

(osteopathic manipulative treatment), in addition to options such as medication or surgery;

- 12,000 – 16,000 hours of supervised postgraduate education (residency) over the course of three to seven years to develop advanced knowledge and clinical skills relating to a wide variety of conditions;
- A comprehensive, three-part medical licensing examination series (either the Comprehensive Osteopathic Medical Licensing Examination, which *specifically tests fitness for osteopathic medical practice*, or the US Medical Licensing Examination);
- Many physicians also choose to sit for certifying board exams in their chosen specialty, either through the AOA Bureau of Osteopathic Specialists or through the American Board of Medical Specialties; and
- They also complete osteopathic and/or allopathic (MD) continuing medical education hours throughout the tenure of their practice.

In recognition of the fact that there are two distinct medical educational pathways and two medical degree types in the US, every state has established laws and regulations which allow physicians who graduated from a COCA-accredited medical school to apply for licensure as a “doctor of osteopathic medicine” (sometimes referred to as a “doctor of osteopathy”), and physicians who graduated from an LCME-accredited medical school to apply for licensure as a “doctor of medicine.” State laws also prohibit non-physicians from using either title.

There is *no* recognized academic or regulatory process in the US that permits the conversion of one primary medical degree into another. MD and DO degrees are awarded only upon completion of separate, fully accredited medical education programs, each governed by distinct accrediting bodies recognized by the US Department of Education. Credentials marketed by diploma mills—often described as “certificates of equivalence” or “supplemental diplomas”—do not constitute degrees from accredited institutions and do not carry validity for licensing, employment/insurance, or clinical practice. They exist solely to mislead.^{1, 2, 3}

The federal Higher Education Act of 1965 recognizes the problem of diploma mills and directs the US Department of Education to provide information to the public and to coordinate with federal enforcement agencies to deter and address such practices. Federal statute defines a diploma mill as an entity that offers academic credentials for a fee while requiring little or no legitimate educational coursework and lacking accreditation from an agency recognized by the Secretary of Education.⁴ Federal law establishes clear standards for the recognition of accrediting bodies, ensuring that only those meeting rigorous criteria (such as COCA and LCME) may serve as authorities on educational quality. Programs or institutions that rely on unrecognized or self-created accreditation frameworks fall outside these standards and may mislead or cause harm to consumers.⁵

¹ “Getting a secondary MD degree as a DO – is it possible, and what could be the harm?”

<https://thedo.osteopathic.org/2026/04/getting-a-secondary-md-degree-as-a-do-is-it-possible-and-what-could-be-the-harm/>

² Diploma Mills and Accreditation. <https://www.ed.gov/laws-and-policy/higher-education-laws-and-policy/college-accreditation/diploma-mills-and-accreditation>

³ College Degree Scams. <https://consumer.ftc.gov/articles/college-degree-scams>

⁴ Higher Education Act of 1965, As Amended Through P.L. 119-21, Enacted July 4, 2025. p. 19, 33. <https://www.govinfo.gov/content/pkg/COMPS-765/pdf/COMPS-765.pdf>

⁵ Higher Education Act of 1965, As Amended Through P.L. 119-21, Enacted July 4, 2025. p. 698 - 706. <https://www.govinfo.gov/content/pkg/COMPS-765/pdf/COMPS-765.pdf>

In addition to violating the Higher Education Act, diploma mills also contravene federal consumer protection principles. The Federal Trade Commission has long held that misleading claims regarding educational credentials, accreditation status, or professional outcomes may constitute deceptive practices under federal law. Representations suggesting that an individual may lawfully advertise an additional medical degree designation—without having completed the accredited degree program associated with that designation—risk misleading not only physicians, but also employers, licensing bodies, and the public.⁶

From the perspective of occupational licensing and regulation, the downstream consequences of diploma mill practices are substantial. Physicians who rely on unearned credentials could be subject to disciplinary scrutiny, employment consequences, or reputational harm. More broadly, the existence of these entities risks confusing the public and undermining confidence in the systems that safeguard educational quality and professional licensure—systems in which state agencies play an essential role.

For this reason, we believe collaboration with state Departments of Education is critical. While educational accreditation is primarily a federal responsibility, state agencies remain key partners in identifying problematic actors, informing the public, and coordinating with state licensing authorities and attorneys general. Clear and consistent messaging from education regulators can help deter misleading practices before they gain further traction.

We respectfully urge the Department to:

1. **Consider issuing general guidance** clarifying that primary medical degrees cannot be converted and holders must complete separately accredited medical education programs recognized under federal law.
2. **Evaluate whether entities promoting medical degree “conversion” services violate state education or consumer protection laws**, particularly where degree-granting authority or equivalency is implied.
3. **Coordinate, as appropriate, with the state attorney general’s office and relevant professional licensing boards** to ensure shared awareness and consistent regulatory responses.
4. **Refer interested parties to established federal resources** maintained by the US Department of Education and the Council for Higher Education Accreditation regarding diploma mills and recognized accreditation entities.

We appreciate your longstanding commitment to preserving academic integrity and protecting the public from misleading claims. The AOA, our state and specialty affiliates, and our members stand ready to assist you in your endeavors. Should you have any questions or if we can be a resource, please contact Raine Richards, JD, AOA Vice President of State and International Affairs at rrichards@osteopathic.org.

Sincerely,

⁶ Avoid Fake-Degree Burns By Researching Academic Credentials. <https://www.ftc.gov/node/60304>