This supplements the March 11, 2020 and May 15, 2020 guidance for Colleges of Osteopathic Medicine (COMs) related to Coronavirus (COVID-19).

In prior statements, the Commission on Osteopathic College Accreditation (COCA) has provided limited approval for the use of distance education and other alternative methods for delivery of curriculum because hospitals and health care facilities that had been expected to provide clinical education were closed to students and other non-essential personnel due to the COVID-19 pandemic. COMs were asked to provide a report to COCA on changes to their educational program by April 1, 2020 with further reporting on a monthly basis.

The guidance described above only provided authority through the end of the Title IV funding period. In the COCA’s May 15 guidance, it was noted that many states and counties have extended their shelter-in-place and other restrictions on large group meetings beyond the end of the prior Title IV funding period. Therefore, based on guidance from the United States Department of Education Office of Postsecondary Education regarding the applicable timeline of the additional regulatory flexibilities available to postsecondary institutions, the COCA extended its own guidance with respect flexibilities consistent with the time period identified by the US Department of Education. Recently, the U.S. Department of Education further extended the period of flexibility on use of distance education to include payment periods that begin on or between March 5, 2020 and December 31, 2020. Accordingly, at its meeting on May 21, 2020, the Executive Committee of the COCA to extend its flexibilities with respect to Distance Education to align with the guidance from the US Department of Education (i.e., applicable to payment periods that begin on or between March 5, 2020 and December 31, 2020). COMs should continue to report to COCA on a monthly basis regarding any changes to their previously reported curriculum.

As with prior statements, COMs utilizing distance education are encouraged to review the requirements set forth in 34 CFR 602.3. COMs must make certain that the distance education model they utilize requires that instructors initiate substantive communication with students on a regular basis.