March 27, 2020

Subject: Accreditation Element 6.12 (COMLEX-USA); Guidance for Colleges of Osteopathic Medicine (COM) regarding the cancellation of scheduled COMLEX-USA exams due to Coronavirus (COVID-19) Pandemic

The Commission on Osteopathic College Accreditation Executive Committee (COCA EC) held a special meeting by telephone conference on March 25, 2020 to discuss certain issues arising due to COVID-19 pandemic, including the ongoing application of Element 6.12 (COMLEX-USA) when some students with 2020 graduation dates will be unable to complete examinations because of the closure of Prometric testing centers and the NBOME’s National Center for Clinical Skills Testing (NCCST). The discussion centered on whether Colleges of Osteopathic Medicine (COMs) could allow fourth-year osteopathic medical students impacted by the closures the option to graduate without passing COMLEX-USA Level 2-CE or Level 2-PE.

After its review and discussion, the COCA EC voted to approve the following guidance on the application of Element 6.12 for COMs with students who are scheduled to be in the 2020 graduating class but are unable to complete the COMLEX-USA Level 2 examinations due to the temporary closure of testing centers:

Recognizing that individual COM leadership is in the best position to determine whether students are qualified for graduation, and that successful completion of a licensing exam sequence will be required for licensure to practice, Deans of Accredited COMs are given the discretion to allow students who would otherwise be scheduled to be in the 2020 graduating class the option to graduate and receive the DO degree without having passed COMLEX-USA Level 2-CE and Level 2-PE, provided that the fourth year medical students:

1. have satisfactorily completed their COM’s other requirements for graduation;
2. are unable to complete the COMLEX-USA Level 2-CE or COMLEX-USA Level 2-PE due to the temporary closure of the Prometric and NBOME exam facilities; and
3. have been recommended for graduation by the faculty, or faculty association, or other approved body (Element 1.6: Degree-Granting Body).

Deans deciding to allow a student to graduate without having passed COMLEX-USA Level 2-CE and Level 2-PE are responsible for advising the student’s residency training program that the student must still successfully complete the COMLEX-USA examination(s).

COMs that opt to offer fourth year medical students the option to graduate without passing COMLEX-USA Level 2-CE and Level 2-PE in response to the Coronavirus outbreak need to document the steps taken by the COM that must include:
The steps taken to ensure students satisfactorily met the COM’s other graduation requirements; and
• Documentation of the faculty, or faculty association, or other approved body approving early graduation (minutes where this approval occurred)

The above documentation must be reported to the COCA (at predoc@osteopathic.org) by the end of the quarter/semester.

This action is applicable for the 2020 graduating class only and is approved solely in response to the extraordinary circumstances surrounding the COVID-19 pandemic. It does not constitute a change in COCA accreditation Element 6.12 beyond the current academic year.

The COCA EC encourages COMs to seek consultation from COCA staff if the COM has questions about whether the steps taken are consistent with COCA requirements and standards.

If you have specific questions related to your COM, please contact the COCA staff directly at predoc@osteopathic.org or by calling (312) 202-8124.