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**COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION**

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November 13, 2020

Subject: Accreditation Element 6.12 (COMLEX-USA); Suspension of Requirement for Successful Completion of COMLEX-USA Level 2-PE

The Commission on Osteopathic College Accreditation (COCA) has received information from the National Board of Osteopathic Medical Examiners (NBOME) concerning disruption of the scheduling and administration of the COMLEX 2-PE examination. Specifically, NBOME has announced the suspension of administrations of Level 2-PE, with plans to resume testing in April 2021.

COCA Element 6.12 (COMLEX-USA) provides that –

“All students must successfully pass COMLEX-USA Level 1, Level 2-CE, and Level 2-PE prior to graduation from an osteopathic medical school.”

In June 2020, COCA announced that Colleges of Osteopathic Medicine (COMs) could allow graduation of fourth year osteopathic medical students who were not able to successfully complete the COMLEX 2-PE exam, provided that such students had satisfactorily completed all other requirements of their COM for graduation and were recommended for graduation by the appropriate committee as described in Element 1.6: Degree-Granting Body.

Because of the ongoing disruption of the administration of the COMLEX 2-PE due to the COVID-19 pandemic, the COCA, through action of the Executive Committee, is suspending the requirement under Element 6.12 for students to successfully complete COMLEX USA Level 2-PE prior to their graduation. The suspension shall remain in place for the duration of the 2020-21 academic year.

This decision is limited to the requirement of successful completion of COMLEX-USA Level 2-PE. The Level 2-PE examination provides an important assessment of students’ clinical skills based on their performance in addressing problem-centered encounters with standardized patients. COCA expects that

COMs will use their own clinical assessment modalities and judgment regarding students' eligibility and readiness for graduation.

As with the June 5, 2020 COCA guidance, graduating students are expected to have completed all other requirements of their COM for graduation and to have been approved for graduation by the appropriate committee. However, due to the number of students unable to complete COMLEX 2-PE, Deans are not responsible for ensuring that the student's residency training programs are advised that the student must still successfully complete the COMLEX-USA examination. Consistent with the requirements for evidentiary submission under Element 1.6, COMs are expected to document the steps taken to ensure students satisfactorily met the COM's other graduation requirements and the graduation recommendations of the faculty, or faculty association, or other approved body approved of the students' graduation.

The COCA is recognized by the United States Department of Education as the accreditation agency for colleges of osteopathic medicine. While the COCA has authority to suspend the requirement of COMLEX 2-PE for purposes of graduation, successful completion of COMLEX 2-PE may still be required by the NBOME in order to qualify for the COMLEX Level 3 exam and by state licensing boards.

Accordingly, COMs should advise their students regarding requirements to advance to practice and students are encouraged to consult with their COM advisors and state licensing boards to ensure that they will be able to meet all requirements for graduation and advancement into osteopathic medical practice.