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## COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION

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June 5, 2020

Subject: Accreditation Element 6.12 (COMLEX-USA); Supplemental Guidance for Colleges of Osteopathic Medicine (COM) regarding required completion of COMLEX-USA Level 2-PE exams

At its meeting on June 4, 2020, the Commission on Osteopathic College Accreditation Executive Committee (COCA EC) discussed information received from the National Board of Osteopathic Medical Examiners (NBOME) concerning the scheduling of the COMLEX-USA Level 2-PE exams. Specifically, on June 3, 2020, due to ongoing concerns related to the COVID-19 pandemic, the NBOME announced its decision to postpone resumption of Level 2-PE testing until September 1, 2020.<sup>1</sup> The scheduling change has complicated the ability of some students with 2021 graduation dates to complete examinations by the end of the 2020-21 academic year.

Earlier this year, on March 27, 2020, following the COVID-19-related closure of the NBOME's National Center for Clinical Skills Testing (NCCST), the COCA approved guidance on the application of Element 6.12 (COMLEX-USA) pursuant to which COMs could decide to allow fourth-year osteopathic medical students to graduate in 2020 without passing COMLEX-USA Level 2-CE and Level 2-PE. At its June 4 meeting, the COCA EC discussed whether to extend its earlier guidance to include fourth year students graduating in 2021. After its review of this issue 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 2021 graduating class:

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 2021 graduating class the option to graduate and receive the DO degree without having passed COMLEX-USA Level 2-PE, provided that the fourth year medical students:

1. have satisfactorily completed their COM's other requirements for graduation; and
2. have been recommended for graduation by the faculty, or faculty association, or other approved body (Element 1.6: Degree-Granting Body).

As with the COCA EC's March 27 guidance, the following requirements apply to COMs that decide to allow a student to graduate without having passed COMLEX-USA Level 2-PE:

- Deans are responsible for ensuring that the student's residency training program is advised that the student must still successfully complete the COMLEX-USA examination(s);
- COMs must document the steps taken to ensure students satisfactorily met the COM's other graduation requirements; and

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<sup>1</sup> The exam had previously been scheduled to resume on July 1, 2020.

- COMs must document that the faculty, or faculty association, or other approved body approved of the students' graduation (minutes where this approval occurred).

The required documentation must be reported to the COCA (at [predoc@osteopathic.org](mailto:predoc@osteopathic.org)) by the end of the 2020-21 academic year.

The above guidance and flexibility are limited to graduation of fourth year osteopathic medical students who have not successfully completed the Level 2-PE exams. The COCA EC's March 27 guidance had extended similar flexibility to Deans to allow fourth year students to graduate without having passed the COMLEX-USA Level 2-CE exam because the Prometric testing centers were closed. However, at this time, the COCA is advised that access to the Prometric testing centers has resumed. Therefore, **students are still expected to achieve a passing score on the COMLEX-USA Level 2-CE exam prior to graduation.** In the event that there is not sufficient access to the Level 2-CE exam, the COCA may reconsider the requirement.

**This action is applicable for the 2021 graduating class only. It does not constitute a change in COCA accreditation Element 6.12 beyond the 2020-21 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](mailto:predoc@osteopathic.org) or by calling (312) 202-8124.