January 25, 2022

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

On November 13, 2020, the Commission on Osteopathic College Accreditation’s Executive Committee (COCA EC) issued a statement suspending the requirement under Element 6.12 for students to successfully complete COMLEX-USA Level 2-PE prior to their graduation, due to the announcement from the National Board of Osteopathic Medical Examiners (NBOME) suspending the administration of the COMLEX-USA Level 2-PE exam. The COCA EC has now extended the suspension of this requirement for Element 6.12 for the duration of the 2021-22 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. The COCA expects that COMs will use their own clinical assessment modalities and judgment regarding students’ eligibility and readiness for graduation.

As under the November 13, 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 other entities for other purposes. 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.