



---

**COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION**

---

August 31, 2022

**Subject: Extension of waivers related to distance education and to the requirement for successful completion of COMLEX-USA Level 2-PE under Element 6.12**

Distance Education

As noted previously, in 2020 the United State Department of Education waived normal requirements and allowed the use of distance education in responding to COVID-19 without going through the regular accreditation process for distance education, and the Commission on Osteopathic College Accreditation (COCA) acted to allow such use of distance education by the COMs. The most recent extension of the waiver covered the duration of the COVID-19 national emergency declaration and 180 days following the date on which the COVID-19 national emergency declaration ultimately expires.

On February 18, 2022, the President published a Notice in the Federal Register entitled Continuation of the National Emergency Concerning the Coronavirus Disease 2019 (COVID-19) Pandemic, 87 Fed. Reg. 10289 (February 23, 2022) <https://www.govinfo.gov/content/pkg/FR-2022-02-23/pdf/2022-03972.pdf>. In the Notice, the President continued the COVID-19 national emergency, stating that “the COVID–19 pandemic continues to cause significant risk to the public health and safety of the Nation. For this reason, the national emergency declared on March 13, 2020, and beginning March 1, 2020, must continue in effect beyond March 1, 2022.” Assuming that this Notice extends the national emergency for an additional year, and assuming that no additional government action is taken on the subject, the national emergency now extends through March 1, 2023, making the new end date for the Department’s waiver of the distance education requirements August 28, 2023. The COCA’s allowance for COMs to make use of the Department waiver is likewise extended for the same time period, or until another change is made to this policy.

Element 6.12: COMLEX-USA

On November 13, 2020, the COCA’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, and on January 25, 2022, the COCA EC issued a statement extending the suspension of this requirement for the 2021-2022 academic year. The COCA EC has now extended the suspension of this requirement for Element 6.12 for the duration of the 2022-23 academic year.

This decision is limited to the requirement of successful completion of COMLEX-USA Level 2-PE. 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 governing body. Consistent with the requirements for evidentiary submission under Element 1.6, COMs are expected to document the steps taken to ensure students satisfactorily meet the COM's other graduation requirements and are recommended for graduation by the faculty, faculty association, or other approved body.

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.

Please direct any questions regarding these statements to COCA staff at [predoc@osteopathic.org](mailto:predoc@osteopathic.org).