



COMMISSION ON OSTEOPATHIC COLLEGE ACCREDITATION

February 5, 2021

This guidance supplements the guidance for Colleges of Osteopathic Medicine (COMs) published on May 15, 2020 regarding the Limited Waiver for COCA Element 6.10 Clinical Experience related to the Coronavirus (COVID-19) Pandemic

On May 15, 2020, the Commission on Osteopathic College Accreditation (COCA) announced a limited waiver for colleges of osteopathic medicine that are experiencing challenges to meeting the requirements of Element 6.10: Clinical Experience due to the coronavirus outbreak. It is noted that Element 6.10 requires the following:

Element 6.10: Clinical Experience (2019)

A COM must ensure that each student participates in one or more required core rotation(s) prior to the fourth-year clinical clerkship experience that is conducted in a health care setting in which the student works with resident physicians currently enrolled in an accredited program of graduate medical education. In addition to the above expectation, a minimum of one required third year clerkship must be completed under the supervision of an osteopathic physician and more than one of the required third year experiences must include an inpatient component.

The COCA is aware that many hospitals and clinical settings that previously served as the training site at which osteopathic medical students would receive the clinical experience required under this Element have been unable to allow students to complete clinical rotations because they are closed to non-essential personnel. It is also noted that COCA believes that the experiences described in Element 6.10 are essential for medical students before they advance into graduate medical education.

COCA is prepared to consider on a case-by-case basis requests from COMs for a limited waiver of Element 6.10 that can include either or both of the following accommodations:

1. The required core rotations clinical experiences can be completed over a 24-month period rather than a 12-month period; and
2. The required clinical experience in a healthcare setting with an accredited graduate medical education program can be satisfied with an elective (i.e., non-core) rotation.

COMs seeking a waiver must demonstrate good cause for the request (e.g., documentation that clinical rotation site was closed to students and other non-essential personnel due to COVID-19 concerns), and a plan for ensuring the student(s) receive the required clinical experiences by the end of the waiver period, including an anticipated rotation schedule for the students impacted. A spreadsheet to document the anticipated student rotations must be submitted. COMs must also submit table 6.9 to demonstrate compliance with Element 6.10 under regular circumstances, not related to the pandemic. Both of these documents are available on the COCA website.

The limited waiver described above will only be applicable to those who were rising third and fourth year osteopathic medical students on May 15, 2020 and will expire June 30, 2021. COCA will continue to monitor the situation and evaluate whether the limited waiver program needs to be re-instated for the 2021-22 academic year.

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.