AACPD Guidance on COMLEX-USA and USMLE for Doctors of Osteopathic Medicine

**Background:**
Osteopathic medical students must take COMLEX-USA examinations for graduation and for licensure in many jurisdictions. COMLEX-USA is aligned with the educational pathway and curriculum for osteopathic students and evidence-based for the practice of osteopathic medicine. Historically, osteopathic students applying to ACGME-accredited residency programs were frequently advised to take USMLE examinations, in addition to their COMLEX-USA, to be competitive at some programs.

By June 2020 the five-year process to create a single accreditation system for GME was complete, resulting in osteopathic and allopathic graduates training in GME alongside one another. In the 2023 NRMP Main match, 1400 U.S. MD seniors and 293 DO seniors matched into anesthesiology PGY-1/2 positions, representing 73% and 15% of the total matched positions, respectively. As an association, we value all trainees on their respective pathways to licensure, residency program application, and board certification and support efforts to reduce bias and undue burden for all applicants to residency.

In 2018, the American Medical Association’s House of Delegates voted unanimously to approve a resolution promoting equal acceptance of the COMLEX-USA and USMLE exams by all U.S. residency programs. Similarly, in 2021 the Coalition for Physician Accountability recommended equity for licensure exam use and provided additional guidance. Recommendation #18 reads:

> "Osteopathic medical students make up 25% of medical students in U.S. schools and these students are required to complete the COMLEX-USA examination series for licensure. Residency programs may filter out applicants based on their USMLE score leading many osteopathic medical students to sit for the USMLE series. This creates substantial increase in cost, time, and stress for osteopathic students who believe duplicate testing is necessary to be competitive in the Match. A combined field should be created in the Electronic Residency Application Service (ERAS) that normalizes the scores between the two exams and allows programs to filter based only on the single normalized score. This will mitigate structural bias and reduce financial and other stress for applicants."

To date, AAMC has not yet created a combined field in ERAS as described above. However, ERAS provides a link to a tool to convert three-digit COMLEX-USA scores to percentiles to facilitate interpretation of score performance. Finally, a recent publication demonstrated substantial score concordance between COMLEX-USA and USMLE results. This suggests that high performance on COMLEX-USA translates well to high performance on USMLE examinations.

In the current environment, in order to recruit qualified applicants using a holistic review process, it should be unnecessary for any medical graduate to take redundant licensing examinations. Family Medicine and Psychiatry specialty organizations have issued leadership consensus statements supporting equity for DO applicants and the use of COMLEX-USA when considering DO applicants for their training programs.
**AACPD Guiding Principles:**

1) The AACPD believes that osteopathic applicants add value to our training programs and specialty.
2) The AACPD encourages equitable and holistic review of all residency applicants.
3) The AACPD recognizes concordance between USMLE and COMLEX-USA examination performance.

**AACPD Recommendations**

1) Anesthesiology residency programs should implement processes that fairly consider osteopathic applicants within the context of their educational pathway and the osteopathic (COMLEX-USA) licensure process.
2) Anesthesiology residency programs should not require osteopathic trainees to undergo other licensing examinations in addition to COMLEX-USA.
3) While we believe that it is in the best interests of our specialty for programs to have a consistent approach, the AACPD recognizes that some programs may choose not to follow this advice. For programs that do not follow this guidance, they are strongly encouraged to make this apparent to prospective applicants through external web pages and other recruitment materials.