

Policy 500: Student Identity Verification

Related Policies**Adopted:
Amended**

I. Purpose:

To define Central Penn College's policy on student identity verification

II. Background

The Higher Education Opportunity Act (HEOA) of 2008 requires the verification of student identity in distance or correspondence education. The purpose of the policy on student identity verification is to establish identity verification procedures for students enrolled in distance education courses as well as for all students who access personal identifiable information via the student portal via my.centralpenn.edu.

The following external rules, regulations, and guidance were used to create the Student Identity Verification policy at Central Penn College:

Code of Federal Regulations 602.17(g) states:

Requires institutions that offer distance education or correspondence education to have processes in place through which the institution establishes that the student who registers in a distance education or correspondence education course or program is the same student who participates in and completes the course of program and receives the academic credit. The agency meets this requirement if it-

1. Requires institutions to verify the identity of a student who participates in class or coursework by using, at the option of the institution, methods such as-
 - i. A secure login and pass code;
 - ii. Proctored examinations; and
 - iii. New or other technologies and practices that are effective in verifying student identity; and
2. Makes clear in writing that institutions must use processes that protect student privacy and notify students of any projected additional student charges associated with the verification of student identity at the time of registration or enrollment.

Middle States Commission on Higher Education publication- Verification of Compliance with Accreditation-Relevant Federal Regulations. 2017 states:

"...In accordance with 34 CFR 602.17(g), the Commission must verify that institutions have effective policies and procedures in place to ensure that the students who register in a distance or

correspondence education course are the same students who participate in an complete the course , and receive the academic credit.”

Examples of acceptable evidence of compliance include:

- Policy on student identity verification for distance and correspondence education
- Policy/procedure on protection of student privacy (FERPA), including password verification.
- Notifications to students regarding fees associated with identity verification.

III. Policy

The Student Identity Verification policy ensures Central Penn College operates in compliance with 34 CFR 602.17(g)(1)&(2) in reference to student identity verification in distance and correspondence education. The methods used to verify a student’s identity in distance education courses, as well as over the phone, are established to protect the privacy of the student’s educational record as well as to verify that the student who registers for a distance education course or program is the same student who receives the academic credit. This policy also serves as formal notification to students of any projected fees associated with the student identification verification process and to clearly state and describe the consistent application on student identification verification procedures.

Student Identification Verification for Distance Education and Electronic Record Access:

Central Penn College uses the mycentralpenn portal (student portal) as the college’s identity and single sign-on system. The system is powered by PortalGuard software provided by PistolStar and requires a secure login and complex password to ensure the student who registers for a course is the same student who participates in the course. This safeguard also ensures that a student who accesses the student portal for other purposes (email, grades, financial aid information, course registration, etc.) is indeed the student who should have access to their information for privacy purposes. The process for of assigning a secure login and complex password is as follows:

- During the admission process, each student who makes application to the college is assigned a unique student identification number.
- Upon acceptance to the college, each student receives a unique and secure network account which is linked directly to their student identification number. The network account serves as an authenticated single sign-on to the student portal (mycentralpenn) where the student gains access to their student email, the college’s learning management system (BlackBoard), the learning center, the student’s account, and to the college’s Central Penn Alert system.
- First time users must establish their identity through a verification process via Active Directory prior to creating a complex password. In this verification process, a student must be able to answer a set of five questions linked to their application as it was recorded at the time the student applied. The questions are: first name, last name, date of birth, student ID number, and the last four digits of the student’s social security number. Once this information is provided, the student can then authenticate their account by completing the complex password process.
- Should a student need assistance for the Central Penn IT HelpDesk in accessing his/her account, the student is asked a series of verification questions. Representatives from the

IT HelpDesk will ask as many qualifying questions as they deem appropriate until they are comfortable that the student's identity has been confirmed. Qualifying question may include: last name, student ID number, home address on record, date of birth, last four digits of the student's social security number, etc. If the request for assistance from the IT HelpDesk is in person, the IT representatives will verify the student's identity with their Student ID card; which includes a picture of the student, the student's ID number and the student's date of birth.

- Students are required to enter their username and password every time they wish to access the student portal.
- Student complex passwords are required to be changed every 180 days.
- Once successfully logged into the student portal the student gains access their courses via Blackboard. All online coursework that is graded or contributes to a student's grade must be submitted in the online course room. This includes fully online courses, blended courses, and web enhanced courses where online submission is required (see faculty syllabus where applicable).
- All users with a secure network account are responsible for maintaining the security of their ID and password. Attempting to discover another user's password or attempts to gain unauthorized access to another person's files or email is prohibited.

Proctoring Exams:

Faculty are required to proctor their own examinations. In some instances, examinations may be proctored by the Director of the Learning Center which is located in ATEC 302 and must be scheduled as far in advance as possible by the faculty member.

Student Privacy (FERPA):

The Family Educational Rights and Privacy Act (FERPA) is a Federal law that protects the privacy of student educational records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education. Central Penn College ensures FERPA rights of the students through the following methods:

- Student can gain access to their student educational records and courses through a secure login and complex password.
- Student password sharing and attempts to gain access to another student's login information is strictly prohibited.
- Students who wish to change their password for any reason can do so in one of the following ways:
 - Students who are logged on to a Central Penn College lab PC can use the <CTRL>+<ALT>+ function to change their password.
 - Students can visit <https://my.centralpenn.edu> from any device with internet access and use the "set password" function which will prompt the student to complete several authentication steps prior to making the change
 - Students who forgot their password can visit <https://my.centralpenn.edu> and use the "forgot password" function, which will prompt the student to successfully answer security questions in order to access their account and change their password. Students may also opt for a one-time password to be sent to an alternate device (cell phone or non-central penn email linked to the student's record).

- As mention earlier, the Central Penn College IT HelpDesk uses strict student identity verification methods prior to assisting any student in accessing their records.

Fees Associated with Student Identification Verification:

Central Penn College does not charge additional fees for student identification verification. In some instances, students in a distance education course may be required to use a web camera and headset for course room assignments. These technologies may be used as student identification verification; however, are not considered fees for the sole purpose of student identity verification. Faculty will provide specific information in the course syllabus at the beginning of each course.

IV. Responsibilities

- The Office of Academic Affairs: responsible for defining and publishing policies on student conduct, plagiarism, and academic dishonesty. These policies can be found in the College Catalog located at <http://www.centralpenn.edu/academics/college-catalog/>
- Students: responsible for making a reasonable effort to protect passwords and to secure resources against unauthorized use or access. Students must not use another individual's account, or attempt to capture, guess, or distribute other users' passwords or similar private information. Please refer to the college's Acceptable Technology Use Policy located in the College Catalog at <http://www.centralpenn.edu/academics/college-catalog/>
- Faculty: technology and personal accountability may not completely verify the identity of a student participating in a distance education course; therefore, faculty should apply pedagogical practices that aid in the verification process such as: virtual class meetings with video, reviewing writing samples from written assignments, group assignment participation, as well as routine interactions via email, phone, and video. Should faculty notice a change in the student's behavior and/or coursework that creates a sudden shift in academic performance, writing styles, or behavior they should report the possible violation of an academic policy to their immediate supervisor.
- IT HelpDesk: responsible for maintaining up-to-date network security, thorough password protection protocols, and strict IT HelpDesk procedures.

V. Effective Date: 2008