McDANIEL
C O L L E G E

Policy: Verification of Student Identity in Distance Education   **Effective Date:** 1/20/2023

Division: Academic Affairs

I.   PURPOSE OF THE POLICY

The purpose of this policy is to ensure that McDaniel College operates in compliance with the provisions of the [Higher Education Opportunity Act (HEOA)(Public Law 110-315)](#) which requires the verification of student identity in distance education.

II.   DEFINITIONS

1. Distance Education – Distance education in federal regulations is defined as "education that uses one or more of the following technologies to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the students and the instructor, either synchronously or asynchronously: (i) the Internet; (ii) one-way or two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices; (iii) audio conferencing; or (iiii) video cassettes, DVDs and CD-ROMs using in a course in conjunction with the previous technologies."

2. Distance Education Programs – The Middle States Commission on Higher Education states that "institutions must submit a substantive change request for the initiation or expansion of distance education or correspondence education wherein 50% or more of the courses or credits in one or more academic programs are provided through the alternative delivery. The Commission requires approval for the first two programs for which 50% or more of the academic program(s) will be offered through distance or correspondence education. The predominant mode of delivery is the deciding factor in determining whether a hybrid/blended program or course is considered distance or correspondence education versus onsite/residential education. Institutions offering alternative delivery are required by Federal regulation to have processes through which they establish that the student who registers is the same student who participates in and completes the course or program and receives the academic credit."

III.   PROCEDURES

All credit-bearing courses and programs offered through distance education methods must verify that the student who registers for a distance education course or program is the same student who participates in and completes the course or program and receives academic credit. According to the HEOA, one or more of the following methods must be used:
- An individual secure login and password,
- Proctored examinations, and/or
- Other technologies or practices that are effective in verifying student identification.

All methods of verifying student identity in distance learning must protect the privacy of student information. If any fees associated with the verification of student identity will be charged to students, they will be so indicated in the online catalog or on the "Tuition and Fees" website.

IV. Compliance

1. **Secure Username and Password**: All students who enroll at McDaniel College are provided with a secure username and password.

   The college has established the Password Complexity and Expiration policy that outlines the minimum complexity requirements for passwords. Users are required to change their passwords at least every 180 days (more frequently for some users) and are encouraged to change their password more frequently. Users should immediately change their password if the password may have been compromised. Users who have forgotten their password or allowed it to expire may reset their password through a secure password reset website.

   All McDaniel College accounts require Multi-Factor Authentication (MFA), also known as 2-Step Authentication. MFA is used to ensure that digital users are who they say they are by requiring that they provide at least two pieces of evidence to prove their identity. MFA requires something the user knows (their password) and something they have (a mobile device or phone). When a person accesses a McDaniel Office 365 service from a new device or web browser, the user will enter their password as usual, but they will also be prompted to approve the login with an app or a code that must be entered before they can access the service. Users are required to use one of the following verification methods:
   - Microsoft Authenticator app notification asking the person to complete verification by selecting Approve from the mobile app push notification
   - A verification code from the Microsoft Authenticator app
   - A text message (SMS) is sent to the person's mobile phone with a 6-digit code
   - A call is placed to the person's mobile phone asking to verify the person signing in

   McDaniel College uses Blackboard as its learning management system. The Blackboard system integrates with college authentication services to ensure appropriate and secure student access to courses and other Student Information Systems. All users of the college's learning management system are responsible for maintaining the security of passwords, or any other access credentials as required.

   Attempting to discover another user's password or attempts to gain unauthorized access to another person's files or email is prohibited.

2. **Verification of Identity**: Students are responsible for providing their complete and true identity information in any identification verification process. It is against college policy for a user to give someone his or her password or to allow others to use his or her account.

   To verify the identity of students attending class, the college's Student Information System provides instructors access to class rosters that includes student photos associated with their name and account. In addition, McDaniel College provides technology for live audio and video interactions in distance learning courses and faculty are strongly encouraged to use these technologies as part of their distance education courses.

   If an exam for a distance course must be proctored, the instructor is required to make arrangements in advance with students. These arrangements must include advance notification of any fees associated with proctoring.

   Students at McDaniel College do not have any additional charges at the time of registration or enrollment for student identity verification.

V.   Responsibilities

1. All users of the college's learning management systems are responsible for maintaining the security of usernames, passwords and any other access credentials assigned. Access credentials may not be shared or given to anyone other than the user to whom they were assigned for any reason. Users are responsible for all uses of their account. Users are responsible for changing passwords periodically to maintain security. Users are held responsible for knowledge of the information contained within the college policies site, the most recent college catalog, and the Student Handbook. Failure to read college guidelines, requirements and regulations will not exempt users from responsibility.

2. Students are responsible for providing complete and true information about themselves in any identity verification process, in accordance with the Student Code of Conduct.

3. Faculty teaching courses through distance education methods hold primary responsibility for ensuring that their individual courses comply with the provisions of this policy. Online instructors have a responsibility to identify changes in students' activity in online courses. Examples of changes could be a sudden change in academic performance, change in writing style, and odd statements by students in discussions or email. Faculty are advised to provide more than one kind of assessment type and to ask students to share important ideas learned from references.

4. The provost or designee is responsible for ensuring compliance with this policy, including informing program directors and other staff in a timely fashion about any changes in the policy.

VI. Student Privacy

McDaniel College complies fully with the provisions of the [Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. 1232g](#). This act protects the privacy of student information in distance education by requiring, with certain limited exceptions, that the student's consent must be obtained before disclosing any personally identifiable information in the student's education records.

VII. Violations and Penalties

Violations of this policy may be grounds for appropriate sanctions. Sanctions may include but are not limited to, a formal reprimand, loss of user privileges, discipline up to and including termination of employment, or, in the case of a student, probation, suspension, or dismissal from the college. Cases against students follow the procedures outlined in the Student Code of Conduct. If it has been determined that an employee has shared their password with other individuals, including student workers, the Help Desk should be notified. If it has been determined that a student has shared their password with other individuals, including family members, the Dean of Students should be notified.

Policy Contact: If you have questions regarding this policy, please contact the dean of graduate and professional studies.

History of Review/Revisions: 1/20/2023