Information

Identity Verification of Students Enrolled in Online Courses

Effective

December 14, 2021

Applicability

This policy applies to University of Louisville online programs, courses, and activities, including courses designated as Distance Education "DE" or other comparable designation. The University of Louisville offers online courses, which fall under the U.S. Department of Education's definition of distance education, and this policy applies to all courses that are subject to the federal requirements for distance education, beginning with the application for admission and continuing through a student's graduation, transfer, or withdrawal from study. University of Louisville employees and students are responsible for complying with this policy.

Administrative Authority

Executive Vice President and University Provost

Responsible Unit

The Delphi Center for Teaching and Learning

502-852-4319

deregs@louisville.edu

History

This policy will be reviewed at least every three (3) years by the Delphi Center for Teaching and Learning for continued alignment with the appropriate federal regulations and policies and revised, as necessary.

This policy was approved by the President's Cabinet on December 14, 2021.

Revision Date(s): January 22, 2024; June 23, 2025; October 20, 2026 (minor edit)

Reviewed Date(s): January 22, 2024; June 23, 2025

Categories

Reason for Policy:

Per federal law and the Southern Association of Colleges and Schools Commission on Colleges' (SACSCOC) Principles of Accreditation, institutions offering online education (hereinafter referred to as distance education) must have processes to establish that the student who registers in such courses is the same student who participates in and receives academic credit.

The purpose of this policy is to ensure that the University of Louisville operates in compliance with the federal requirements concerning the verification of student identity in distance education. This policy provides awareness to University of Louisville employees of the regulations and requirements related to verification of student identity and helps to eliminate risks of non-compliance to the University of Louisville and its students.

Statement:

The University of Louisville (University or UofL) is committed to complying with all applicable requirements regarding the operation of distance education within states and U.S. territories. The University has established processes to confirm that a person who is enrolling in distance education courses at the University is the same person who enrolls at the University, completes examinations, and participates in, completes, and receives credit for the course.

The University meets the federal requirement by authenticating student identities through an individual secure login and password (i.e., User ID and password). The University uses a combination of course management system (learning

management system "LMS") and student, financial, and human resources management system in conjunction with student code of conduct policies to ensure the integrity of its online learning system and to verify the identity of enrolled students. Required multifactor authentication (MFA) has been implemented across these university systems.

Secure Login and Password

Each student has their own assigned User ID and student-generated password to log into learning management systems. The User ID is not a secure credential and may be displayed at various areas in the learning management system. The password used to enter the system **is** a secure credential. Access passwords may not be shared or given to anyone other than the user to whom they were assigned for any reason. All users of the University's learning management systems are responsible for maintaining the security of passwords and any other access credentials assigned. The University provides information to its users, including students, regarding password security, academic integrity, privacy rights, and sensitive data security.

Associated Fees with Verification of Student Identity

The University is required, through federal regulations and SACSCOC, to notify students of any additional student charges associated with the verification of student identity at the time of registration or enrollment. Federal regulations also require the University to make readily available to enrolled and prospective students the cost of attending the institution (34 CFR § 668.43).

The University notifies all students of projected additional costs in the Schedule of Classes. Registration for classes at UofL is an electronic process, and bills are generated based on the student's course selections. Therefore, if any distance education course requires a proctored exam or has other associated fees, students are notified upon registration for the class. The Schedule of Classes indicates that a proctor, if needed, may charge the student a fee.

The Delphi Center for Teaching and Learning provides guidance that should be used as a reference for proctored examinations: https://delphi.louisville.edu/teaching-

resources/exam-proctoring

The University may also authenticate student identities through a combination of the following methods:

- Proctored examinations (remote and/or in-person) https://delphi.louisville.edu/teaching-resources/exam-proctoring;
- Pedagogical and related practices that are effective in verifying student identity (faculty review, questioning students, etc.); or
- Other technologies approved by the University that have been shown to be effective in verifying student identification.

Pedagogical and Related Practices

As technology and personal accountability are not absolute in determining a student's identity, instructors are encouraged to design courses that use assignments and evaluations that support academic integrity. Changes in student behavior such as sudden shifts in academic performance or changes in writing style or language used in discussion groups or email may indicate academic integrity problems. Instructors are encouraged to use a variety of assessment instruments, and to routinely ask students to share, in appropriate ways, important ideas learned from texts and references, require research projects and paper assignments to be submitted in steps, and/or use websites or technologies that check for plagiarism.

New or Emerging Technologies

Third party vendors that provide robust identity verification or proctoring software services may be used as an option by the University or its academic units. Course instructors must use the identity verification or proctoring software approved by the University. Instructors may, with cause, request to use alternative identity verification or proctoring software. If alternate identity verification software is approved, instructors are responsible for informing the Academic Technology Committee of any new technologies being used to verify student identity so that published information on student privacy can be maintained appropriately, and so that the University can coordinate resources and services efficiently. Because

technology and personal accountability may not verify identity absolutely or ensure academic integrity completely, instructors are encouraged, when feasible and pedagogically sound, to design courses that employ assignments and evaluations unique to the course and that support academic integrity.

In addition to the aforementioned policies and procedures, the UofL Student Code of Conduct applies to all students regardless of location and addresses the misuse of electronic resources. Further, the UofL Student Rights and Responsibilities document outlines for students the definition of academic dishonesty, which includes situations such as such as sending a substitute to take one's test, conducting research for another student, and other related situations.

Privacy Protection

The privacy of student education records is governed by FERPA. Any and all methods used by any University employee to access and/or verify student identity in distance education must protect the privacy of student information and be in compliance with FERPA, KRS 61.931-934, the University's information security policies, and the University's Privacy Statement.

Personally identifiable information collected by the University may be used, at the discretion of the institution, as the basis for identity verification. For instance, a student requesting a password to be reset may be asked to provide two or more pieces of information for validation to compare with data on file.

Compliance

Employees and students are expected to comply with this policy and associated University policies in promoting the academic integrity of its distance education courses, as explained in the University's catalog and Student Handbook under academic regulations. These policies are widely disseminated throughout the University.

Units and employees are expected to comply with this policy when engaging in distance education courses and programs. Failure to comply could result in disciplinary action of employees, suspension of distance education courses, and/or

financial loss of courses found in violation of this policy. Federal regulations related to distance education were used to guide this policy and any violation of this policy will be taken seriously.

Individuals may report violations of this policy to the Delphi Center for Teaching and Learning at 852-4319 and deregs@louisville.edu, the University Integrity and Compliance Office at compliance@louisville.edu, or to the University's Compliance and Ethics Hotline.

Related Information:

UofL Procedures on Notification of Charges and Other Fees Associated with Verification of Student Identity

Federal Regulation:

34 §602.17(g): https://www.ecfr.gov/current/title-34/part-602/section-602.17#p-602.17(g)

SACSCOC

Distance Education and Correspondence Courses Policy Statement: https://sacscoc.org/app/uploads/2019/07/DistanceCorrespondenceEducation.pdf

KY Personal Information Security and Breach Investigation

In addition to the foregoing, the University of Louisville complies with applicable state law, such as KRS 61.931-934. KRS 61.931-934 is a data privacy law that imposes data security requirements, investigation requirements and breach notification requirements on governmental agencies and "nonaffiliated third parties" that do business with governmental agencies.

Definitions:

Distance Education: The United States Department of Education defines distance education as follows:

(1) Education that uses one or more of the technologies listed in paragraphs (2)(i) through (iv) of this definition to deliver instruction to students who are separated from the instructor or instructors and to support regular and substantive interaction between the students and the instructor or instructors, either synchronously or asynchronously.

(2) The technologies that may be used to offer distance education include:

(i) The internet;

(ii) One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;

(iii) Audio conference; or

(iv) Other media used in a course in conjunction with any of the technologies listed in paragraph (2)(i) through (iii) of this definition.

(3) For purposes of this definition, an **instructor** is an individual responsible for delivering course content and who meets the qualifications for instruction established by an institution's accrediting agency.

(4) For purposes of this definition, **substantive interaction** is engaging students in teaching, learning, and assessment, consistent with the content under discussion, and also includes at least two of the following:

- Providing direct instruction;
- Assessing or providing feedback on a student's coursework;
- Providing information or responding to questions about the content of a course or competency;
- Facilitating a group discussion regarding the content of a course or competency; or
- Other instructional activities approved by the institution's or program's accrediting agency.

(5) An institution ensures **regular interaction** between a student and an instructor or instructors by, prior to the student's completion of a course or competency:

- Providing the opportunity for substantive interactions with the student on a predictable and scheduled basis commensurate with the length of time and the amount of content in the course or competency; and
- Monitoring the student's academic engagement and success and ensuring that an instructor is responsible for promptly and proactively engaging in substantive interaction with the student when needed, on the basis of such monitoring, or upon request by the student.

Responsibilities:

All **Users** of the University's learning management system (LMS) are responsible for any and all uses of their account. Users are responsible for changing passwords periodically to maintain security.

Students are responsible for providing accurate and true information about themselves in any identity verification process. The University requires students to follow University's policies regarding security, plagiarism, and other forms of academic dishonesty. When students receive their email account, they receive an email from Information Technology Services (ITS) that says, "Please ensure that you are familiar with the University's policies and standards located at https://louisville.edu/security/policies. Use of this account indicates the acceptance by you of these policies and standards, changes or modifications." University of Louisville student community members are expected to uphold and abide by the Student Code of Rights and Responsibilities.

Instructors teaching courses through distance education methods have the primary responsibility for ensuring that their courses comply with the provisions of this policy and its associated procedures and regulations. Instructors may consult with the Delphi Center to ensure that their distance education courses meet the above verification of student identity requirements.

Unit Heads (Deans and directors) are responsible for ensuring that academic awards, degree programs and instructors within their unit comply with the provisions of this policy and regulations.

The Delphi Teaching and Learning Center is responsible for interpretation of this policy, educating unit heads and other University leadership of this policy and

any changes to it in a timely fashion. The Delphi Center shall, as requested, provide instructors with appropriate training to use pedagogical approaches and technology to promote academic integrity. The Delphi Center is responsible for creating and maintaining informational resources and trainings, as needed, covering verification of student identity for instructors.

Forms/Online Processes:

Information can be found here: https://delphi.louisville.edu/teaching-resources/exam-proctoring