IDENTITY VERIFICATION POLICY

Purpose: The United States Federal Higher Education Opportunity Act (HEOA) requires that all institutions offering distance or correspondence courses or programs have processes to ensure that a student registering for a course is the same student who participates in, completes, and receives credit for the course or program. The HEOA identifies one or more of the following methods as acceptable:

- A secure login and password;
- Proctored examinations;
- New or other technologies and practices that are effective in verifying student identification.

Policy: To comply with HEOA, Concordia College adheres to the following policy:

- All students are issued unique email addresses with a secure login and password upon admission to Concordia College. This email account is the only official account used for communication between the institution and the student.
- All distance or correspondence courses and programs use Moodle, Concordia's learning management software. Moodle does not store Concordia passwords. User identity is verified against Concordia servers using secure login authentication.
- Students must use their secure login and password to access their course materials, submit assignments, and see their grades.
- Data transmission of login information to systems containing student grade data is secured using appropriate encryption technology.
- Course instructors may require proctored examinations or use other technologies to verify student identity.
- Course instructors inform and emphasize the college's Academic Integrity Policy in their course materials. All violations of academic integrity will be submitted to the Office of Academic Affairs as specified in the policy.

Student Verification Protocol: Concordia College uses collected personal information as the basis for identity verification while adhering to FERPA requirements. All users requesting assistance to reset passwords or to gain access to various systems have their identity verified by at least two means of identification. Examples include: student ID, date of birth, last four digits of their Social Security Number, or other similar information that uniquely verifies the user's identity.

The Family Educational Rights and Privacy Act (FERPA) provides the requirements designed to protect the privacy of students and their records. FERPA protects the access and release of educational records and defines student rights concerning their records. The College is in compliance with the Family Educational Rights and Privacy Act of 1974 (FERPA) as amended. Under FERPA, students have the right to:

1. inspect and review their education records within 45 days of the day that the Official Record Keeper receives a request for access;
2. request the amendment of the education record that the student believes is inaccurate or misleading;
3. consent to disclosure of personally identifiable information contained in the student's education records, except to the extent that FERPA authorizes disclosure without consent; and
4. file a complaint with the U.S. Department of Education concerning alleged failures by Concordia College to comply with the requirements of FERPA.

The College publishes and distributes to all students a Notification of FERPA Rights that describes College policies in each of the four areas mentioned above. More information is available in the Registrar's Office.

User Responsibility: Users are responsible for maintaining the security of their own usernames and passwords. Access credentials may not be shared or given to others nor to third-party systems/administrators. The College recommends that all users change their passwords regularly. More information is available in the Information Technology Services Acceptable Use Policy.

Instructor Responsibilities: Distance learning instructors hold an important responsibility for ensuring that students comply with the College's identity verification policy. Instructors are encouraged to design assignments and courses that support academic integrity, such as employing assignments and evaluations that deter falsification, plagiarism, and other forms of cheating. Instructors should only accept course assignments and activities that are graded or factored into a grade (e.g., participation) through tools which verify student's identity, such as Moodle and other sites that require users to log in or have a unique course password.

Responsible Office(s) for Consistent Application of Student Verification Procedures: The Office of Academic Affairs, Registrar's Office, and Information Technology Services are jointly responsible for ensuring compliance with this policy and to ensure that deans, department chairs, and program coordinators are informed of any changes in the policy in a timely fashion.

Higher Education Opportunity Act: For more information, review the Higher Education Opportunity Act.