

Online Student Identity Verification Policy

Administrative policy approved June 30, 2023. Effective immediately.

Related policies and forms: <u>Computer & Network Use Policy</u>; <u>Online Privacy Policy</u>; <u>Student Records Policy—FERPA</u>

Scheduled review date: June 2025 (Chief Information Officer and Associate Dean for Online Education.

A. Policy Statement

Southwestern Law School is committed to maintaining the highest level of academic integrity and complying with Standard 511 of the American Bar Association's Standards for Approval of Law Schools and the provisions of the U.S. Higher Education Opportunity Act concerning verification of student identity in distance education. The purpose of these regulations is to ensure that the person who receives credit for the course is the same person who did the work for the course.

This policy outlines the procedures Southwestern uses to verify the identity of students participating in online or hybrid courses and programs. Southwestern does not charge fees for any student verification process.

B. Individual Courses and Grades

Each online or hybrid course must include a clear and actionable plan for verifying the identity of each student enrolled in the course. For courses in the Online J.D. Program, the plan must be approved by the Associate Dean for Online Education. For other courses, the plan must be approved by the Associate Dean for Academic Innovation and Administration.

In doctrinal courses, at least 50% of the course grade in an online or hybrid course must consist of work accomplished by the student when their identity is verified and it is highly likely that they are using only the aids intended (e.g., proctored examinations, live video presentations, video-based assignments, etc.). In skills and other courses, at least

20% of the course grade in an online or hybrid course must consist of work accomplished by the student when their identity is verified and it is highly likely that they are using only the aids intended.

C. Procedures

Not all of the tools and procedures listed below are used in every online or hybrid course. But in all online and hybrid courses, the means of verifying student identity equal or exceed the means used in residential instruction.

- 1. Identity verification during the admissions and matriculation processes:

 During the application and admission process, student identity is vetted in accordance with standard practices. Students must provide their complete and true identity information in any identification verification process. Sharing or allowing others to use their username, password, or account is against Southwestern policy. To help verify identity, Southwestern may also ask an admissions applicant to show a current government-issued ID during an interview. Before matriculating into the Online J.D. Program, students must acknowledge that they have read this policy, the Computer & Network Use Policy, and the Online Privacy Statement. All admitted students must also show a current government-issued ID before Southwestern issues an ID and access card.
- 2. Secure username and password: Southwestern will provide each student with a secure username and password following initial registration ("Southwestern Credentials"). Each student's Southwestern Credentials enable authentication to various Southwestern systems, such as school email, the Canvas Learning Management System (LMS), the Portal (student information), and Colleague Self-Service (class registration, student grades, tuition). During the admissions process, students are emailed their Southwestern Credentials through the ACES2 Admissions CRM platform. For additional information, consult the "About Passwords" document on the Information Technology section of the Portal.
- **3. Strong password requirements and changes**: Passwords must be at least 12 characters long, contain at least one alphabetic and one numeric character, be different from the last five passwords, and not be easily guessable (e.g., license plate, telephone number, birthday, etc.).
- 4. Multifactor authentication and single sign-on: Southwestern uses two-factor authentication to provide additional security for the student's username and password. Two-factor authentication is required for a student to access applications, including the learning management system. All students are issued Microsoft Active Directory account to authenticate against internal, hosted, and cloud solutions.

- 5. Account responsibility: Students are responsible for maintaining the security of usernames, passwords, and other required access credentials. An account is given to an individual for exclusive use by that individual. It is against Southwestern policy for a user to give someone their password or allow others to use their account. When using Southwestern resources, users must not attempt to disguise their identity, the identity of their account, or the machine they are using. Users are held responsible for all activities associated with their accounts and must report any compromises of their account immediately to ithelp@swlaw.edu. Attempting to discover another user's password or gain unauthorized access to another person's account, files, or email is prohibited and violates Southwestern's Computer and Network Use Policy.
- 6. Learning management system (Canvas): Southwestern uses Canvas as its learning management system. Canvas integrates with Southwestern's authentication services to ensure appropriate and secure student access to courses and other student information systems. Students must use their Southwestern username and password to access Canvas. Only students officially enrolled in a course and student Teaching Assistants for the course are able to access the course Canvas page and academically engage in the course. In addition, every action within a Canvas course site registers on the extensive tracking features of Canvas, which track each user in terms of time and duration of the action and part of the site involved, even if the student does not post. Students are encouraged to associate a current photo with their LMS account to help visually identify the student.
- 7. **Assignments submitted via Canvas:** Students authenticate to Canvas using their Southwestern Credentials, which verifies their identity into the platform, thus ensuring the assignment is uploaded by the respective student.
- 8. Synchronous classes: For courses with online synchronous components, a faculty member may request that the Academic Administration department prepare a photo roster. Professors are encouraged to require students to keep their cameras on during each session, absent good cause. Professors may also choose to require students to submit a short video assignment at the start of the course that will help them get to know the students and create a baseline for future assignments or to meet virtually with students, with cameras on.

9. Proctored examinations:

a. ExamSoft: Most online examinations are administered using ExamSoft's Examplify platform, which includes two features designed to verify student identity and ensure exam security. The ExamID feature uses facial recognition technology to ensure that the enrolled student is present

during the entire exam. The second feature is ExamMonitor, an advanced remote proctoring solution that ensures comprehensive monitoring of exam-takers through video and audio surveillance during the entire examination. Additional information about Examsoft is available on the Portal.

b. Zoom proctoring: In limited circumstances, Southwestern may authorize proctoring via Zoom. For Zoom proctoring, an individual authorized by Southwestern will observe as the student completes an examination or other assessment. Before the assessment begins, the student must share a current government-issued I.D. with the proctor. For Zoom proctoring, students will use two devices: one to take the test and another for a video feed to the proctor that show the student's face, the computer screen, and the workspace. A proctor may not work with more than 10 students at any given time.

D. Privacy

Southwestern is committed to ensuring the privacy of its students and student information. All methods of verifying student identity in distance learning protect the privacy of student information under the Family Educational Rights and Privacy Act (FERPA). All personal information collected for the purposes of this policy will be handled in accordance with applicable laws and Southwestern's Online Privacy Policy.

Southwestern also reserves the right to use other technologies to verify student identity that are not specifically mentioned in this policy.

E. Responsibility for Student Identity Verification

- 1. The Information Technology department oversees username and password assignments and password changes, multi-factor authentication, Single Sign-On (SSO) protocols, system monitoring, and overall online security.
- 2. The Administrative Services Office verifies entering student identities before issuing a Southwestern ID and access card.
- 3. The Registrar's Office is responsible for compliant proctoring.
- 4. Academic deans are expected to ensure that faculty within their programs are aware of and comply with this policy.
- 5. Individual faculty teaching online or hybrid courses are responsible for ensuring their individual courses comply with this policy.
- 6. When necessary, the Vice Deans or the President & Dean may address non-compliance through performance reviews or other measures as appropriate.

F. Reservation of Rights

Southwestern reserves the right to modify this policy at any time and for any reason.