



## INSTITUTIONAL PRACTICES FOR VERIFICATION OF STUDENT IDENTITY AND PROTECTION OF STUDENT PRIVACY

### Policy Change Approved on First Reading

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The Higher Learning Commission (HLC) Board of Trustees (“the Board”) approved this policy on first reading at its meeting on February 25, 2022.

#### Background

Consistent with federal regulations, accrediting agencies must “make 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.” (34 Code of Federal Regulations 602.17(h)).

Revisions to federal regulations that went into effect July 1, 2020, clarified that institutions’ obligations related to student privacy go beyond student identity verification in distance and correspondence education offerings. The proposed policy revisions would reflect this expansion and retitle the policy accordingly.

#### Comments Invited

HLC invites comments on this change before the Board takes final action at its meeting on June 23–24, 2022. Comments can be sent to [policycomments@hlcommission.org](mailto:policycomments@hlcommission.org). Comments are due by May 20, 2022.

#### Proposed Change

Wording that was deleted or revised is shown as strikethrough (~~old wording~~); new language, whether through addition or revision, is shown in bold (**new wording**).

Policy Title: **Institutional Practices of for Verification of Student Identity and Protection of Student Privacy**

Number: FDCR.A.10.050

**Student Identity Verification.** An institution offering distance education or correspondence education, as such terms may be defined in federal regulations shall have processes through which the institution establishes that the student who registers in the distance education or correspondence education courses or programs is the same student who participates in and completes and receives the academic credit.

~~Institutional Practices.~~ In verifying the identity of students who participate in class or coursework the institution may make use of a one or more methods, at the option of the institution, which may include but need not be limited to: (1) secure login and pass code; (2) proctored examinations; and (3) new or other technologies and practices that are effective in verifying the identity of students. ~~Such method(s) must have reasonable and appropriate safeguards to protect student privacy.~~ Institutions must notify students at the time of registration or enrollment of any projected additional student charges associated with the verification of student identity such as separate fees charged by proctoring services, etc.

All institutions offering distance education or correspondence education, as such terms may be defined in federal regulations shall have processes through which the institution establishes that the student who registers in the distance education or correspondence education courses or programs is the same student who participates in and completes and receives the academic credit.

**Student Privacy.** All institutions must maintain procedures and processes for ensuring the protection of student privacy. Such procedures and processes, including any methods related to student identity verification must also implement reasonable and appropriate safeguards to protect student privacy.

**HLC Review.** HLC will review an institution's student identity verification protocols when an institution requests permission to add programs in distance delivery **and correspondence** as well as during a comprehensive evaluation **that includes a federal compliance review.** HLC will also require that institutions submit information about student identity verification protocols on HLC's Institutional Update.

**HLC will review all institutions' procedures and processes for ensuring the protection of student privacy during all comprehensive evaluations within the context of the Criteria for Accreditation.**

Policy Number Key

*Section FDCR: Policies Required by Federal Regulation*

*Chapter A: Federal Compliance*

*Part 10: General*

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*Last Revised: June 2019*

*First Adopted: February 2009*

*Revision History: Adopted February 2009; revised February 2011; revised and renumbered June 2012; revised June 2019, effective September 1, 2019*

*Notes: Former policy number: 4.0(d). In February 2021, references to the Higher Learning Commission as “the Commission” were replaced with the term “HLC.”*

*Related Policies:*