

## Distance Education Policies and Procedures

These policies and procedures are designed to ensure Clayton State University compliance with Federal Regulations concerning the definition of distance vs. correspondence education, verification of student identity in distance education, and student privacy protection in distance education.

### Table of Contents

<b>Distance Education Policies and Procedures .....</b>	<b>1</b>
<b>Defining Distance Education .....</b>	<b>2</b>
<b>Policy for Verification of Student Identification in Distance Education .....</b>	<b>3</b>
<b>Student Privacy Protection.....</b>	<b>4</b>
<b>Responsible Parties.....</b>	<b>4</b>
<b>FERPA and Distance Education .....</b>	<b>4</b>
<b>Special Cases within Distance Education Student Discussion or Forum Postings</b>	<b>5</b>
<b>Sites Outside of the University .....</b>	<b>5</b>
<b>Plagiarism Detection Software.....</b>	<b>5</b>
<b>Other Student Privacy Information Sites.....</b>	<b>6</b>
<b>Notification of Fees Associated with Distance Education .....</b>	<b>6</b>

## Defining Distance Education

Clayton State University uses the Federal (2020) and Southern Association of Colleges and Schools Commission on Colleges (adopted 2010; revised and edited 2020) as the definitions of distance education and correspondence education. That is,

“For the purposes of SACSCOC’s accreditation review, distance education is a formal educational process in which the majority of the instruction (interaction between students and instructors and among students) in a course occurs when students and instructors are not in the same place. Instruction may be synchronous or asynchronous. A distance education course may use the internet; one-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices; audio conferencing; or other digital media if used as part of the distance education course or program.”

“Correspondence courses are part of a formal educational process under which the institution provides instructional materials, by mail or electronic transmission, including examinations on the materials, to students who are separated from the instructor. Interaction between the instructor and the student is limited, is not regular and substantive, and is primarily initiated by the student; courses are typically self-paced.”

*(SACSCOC Policy Statement on Distance Education and Correspondence Courses, 2020)*

Clayton State offers four different types of technology-enhanced or delivered courses in terms of scheduling:

- Entirely Online (All online, 100%)
- Full (95% - 99% online, may include up to 2 on-campus visits)
- Partial (51% - 95% online)
- Hybrid (30% - 50% online)
  - It is assumed that for the Hybrid course offerings a majority of the interaction will take place in the face-to-face environment, therefore **only** courses scheduled as *Entirely, Full, or Partial* will be required to maintain regular interactions between students and instructors and among students.

## Policy for Verification of Student Identification in Distance Education

Clayton State University must comply with the provisions of the United States Federal Higher Education Opportunity Act (HEOA), Public Law 100-315 concerning the verification of student identity in distance learning.

All credit bearing courses and programs offered through distance education or correspondence must verify that the student who registers for a course or program is the same student who participates in, completes the course or program, and receives academic credit. One or more of the following methods must be used for verification purposes:

1. Upon admission to Clayton State University all distance education students are required to present identification either in person or through a notarized copy.
2. A unique secure login and password (CSU username and password).  
All students at Clayton State University are given a unique username and password. While usernames are system-generated, students are not given their initial password until their identity is verified. A CSU username and password, and the use of multi-factor authentication (MFA), is required in order to gain access to course materials on the learning management system. This authentication method is also the only means of gaining access to courses/content delivered synchronously through web-conferencing systems.
3. Proctored examinations (testing center or online verification)  
Examinations that are offered at Clayton State's Testing Center are proctored and required students to show a form of identification prior to testing. Additionally, departments and programs can choose to use third-party vendors who use web-based means to verify and proctor examinations.
4. Pedagogical and related practices that are effective in verifying student identity (video chat, review sessions, etc.)  
Faculty members who teach online also have a responsibility to identify and report changes in students. These could include sudden changes in academic performance, change in writing style, using multiple assessment types, conflicting statements made by students in discussions or on email, etc.

## Student Privacy Protection

Regardless of the method used, student identity verification must protect the privacy of student information. Students **must** be notified at the time of registration or enrollment of any fees associated with the verification of their identity.

## Responsible Parties

All system users are responsible for following the network security policy. Passwords must be changed every 180 days (via system generated message) in order to maintain security.

Faculty teaching courses through distance education have the primary responsibility of making sure that their courses comply with the policies regarding verification and protection of identity.

Deans and Department Chairs are responsible for making sure that faculty are aware of the policy and that academic degree programs are in compliance.

Academic Affairs is responsible for university-wide compliance and informing deans and department chairs of any changes.

The Bursar is responsible for maintaining and publishing any fees associated with the verification of identity.

## FERPA and Distance Education

All credit bearing courses and programs offered through distance education must assure compliance with the Family Educational Rights and Privacy Act (FERPA). As such, Clayton State University personnel must not permit access to or release of any confidential student information to any third parties without written consent of the student other than the following (34 CFR § 99.31):

- School officials with legitimate educational interest
  - Other schools to which a student is transferring
  - Specified officials for audit or evaluation purposes
  - Appropriate parties in connection with financial aid to a student
  - Organizations conducting certain studies for or on behalf of the school
  - Accrediting organizations
  - To comply with a judicial order or lawfully issued subpoena
  - Appropriate officials in cases of health and safety emergencies
  - Appropriate external parties, such as law enforcement agencies, in order to investigate and respond to suspected violations of law or University policy.
- Any such disclosures shall comply with all applicable laws.

Further, electronic student submissions should not be accessible to anyone other than the student and the University employee who needs the electronic submission to carry out his/her duties. These individuals would usually include the instructor, administrators or staff approved by the University, and e-learning administrators. For student work to become available to a third party, the student must give permission. This consent is voluntary and a student may decline. If a student declines to give consent, the student cannot be denied any academic opportunity or privilege, or suffer any adverse consequences as a result.

### Special Cases within Distance Education

#### **Student Discussion or Forum Postings**

Written consent to display a student's identity is not necessary for electronic discussion or forum postings if:

- The students perform the posting.
- Electronic submissions do not contain grading or evaluative comments of a professor.
- Students are notified in advance via the syllabus that the posting of their work is a course requirement.
- Submitted work is not available to anyone other than other class members and University approved officials.

#### **Sites Outside of the University**

If students are required or requested to post to websites or social networking sites outside of CSU, FERPA protections as to third parties cannot be assured. As a result, instructors should inform students of the issues, conditions, and associated risks at the beginning of the semester using the course syllabus. Instructors should never post student grades, ID numbers or any other personally identifiable information on a third party site. Students should also be warned against posting personal information about themselves or their classmates.

#### **Plagiarism Detection Software**

University faculty may use or require the use of plagiarism detection software as part of their course. Clayton State currently is part of a University System of Georgia contract for the use of Turnitin.com. Turnitin.com is a third party system and therefore faculty should include the following statement on their syllabus indicating the use of the system for plagiarism detection:

*Students agree that by taking this course all required papers may be subject to submission for textual similarity review to Turnitin.com for the detection of plagiarism. All submitted papers will be included as source*

*documents in the Turnitin.com reference database solely for the purpose of detecting plagiarism of such papers. You should submit your papers in such a way that no identifying information about you is included.*

### **Other Student Privacy Information Sites**

- Clayton State University Registrar <http://www.clayton.edu/registrar>
- University System of Georgia Business Procedures Manual  
[http://www.usg.edu/business\\_procedures\\_manual/section12/C1450](http://www.usg.edu/business_procedures_manual/section12/C1450)

### **Notification of Fees Associated with Distance Education**

All fees associated with distance education courses and programs at Clayton State University must be in the course schedule listing associated with that course.