Verification of Student Identity Policy

Policy Statement

This policy is to ensure Manhattanville College operates in compliance with the provisions of the United States Federal Higher Education Opportunity Act (HEOA) concerning the verification of student identity in distance education.

Manhattanville College will use a secure unique student user ID to identify and verify each student’s identity when accessing college resources. These ID’s will only be created and assigned through the College’s SIS.

Entities Affected by the Policy

This Policy applies to all students in online (distance education) courses or programs as well as faculty, staff, contractors, or administrators supporting those courses or programs.

Policy Background
Federal regulations, in accordance with 34 CFR §602.17(g), require institutions that offer **distance education** or **correspondence education** to have processes in place through which the institution establishes that the student who registers in any course offered via distance education or correspondence is the same student who academically engages in the course or program, completes the course or program, and earns credit for the course, or credential for the program. Please refer to 34 CFR §600.2 for definitions of distance education and correspondence course.

Institutions can elect to use a variety of methods to verify the identity of students who participate in distance or correspondence education. Examples may include a secure login and pass code, proctored examinations, and new or other technologies and practices that are effective in verifying student identity.

In accordance with 34 CFR §602.17(h), institutions must use processes that protect student privacy and notify students at the time of registration or enrollment of any projected additional student charges associated with the verification of student identity including any required travel to campus.

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**Policy Procedures**

The primary process for ensuring that the student who registers in any course offered via distance education or correspondence is the same student who academically engages in and completes the course or program is through **secure login and passcode**. Manhattanville’s Office of Information Technology is responsible for creating a secure, unique login and password for each accepted student using a FERPA compliant procedure. Both the Office of Admissions and the Office of the Registrar maintain student biographic, demographic, admission and enrollment records in the Manhattanville Student Information System (SIS). These data are replicated into the Manhattanville Identity Management system, which creates LDAP authentication records in addition to authorization controls in the Manhattanville hosted Blackboard Learning Management System (LMS). Access to the LMS requires valid LDAP credentials in addition to an official class registration.
Upon enrollment, and subsequent course registration, Manhattanville’s Office of Information Technology creates a secure, unique login and password for each accepted student. All students at the Manhattanville College are provided an ID for secure access to College systems, including for distance learning. All user accounts are created directly from Manhattanville’s ERP. New students claim their ID through the College’s Identity Management system after providing their unique “Student ID” number and their date of birth.

Student accounts are created in a separate domain from employees to increase security. Student accounts are created with a short name formula (Inamefinitial) and an incremented number determined by the ERP system. Student accounts are only created after term deposits have been recorded in the system. Initial passwords are set to auto-expire after first use. As part of this set-up, the Identity Management system requires that the student create two secure questions and answers to be used in the event that students need to change their password or reclaim their ID. Students may reset their password by visiting the “password reset” link in the Manhattanville Portal; resets are logged by IT. Student accounts are only granted access to Manhattanville’s Learning Management System (LMS) content though automatic feeds from the ERP based upon “active in term” and “active” course registration meaning, students lose access to the LMS if they are not enrolled in an active term and actively enrolled in each specific course.

Faculty are not able to add students manually to their own course nor can faculty change student passwords. All local and remote users must be authenticated using a unique user identifier and password or other approved authentication mechanism (see Password Policy). No temporary passwords are provided, all passwords must meet a minimum standard of complexity, student passwords much be reset every 180 days, and one cannot reuse passwords used within the last 5 cycles of password changes. All of these measures follow industry best practices to prevent unauthorized use or access.

Students are responsible for providing their complete and true identity information in any identification verification process. It is against College policy for a user to give someone his or her password or to allow others to use his or her account (see the Manhattanville College Office of Information Technology Acceptable Technology Use Policy).

Manhattanville College uses Blackboard as its learning management system. The Blackboard system integrates with University authentication services to ensure
appropriate and secure student access to courses and other Student Information Systems. All users of the College’s learning management system are responsible for maintaining the security of usernames and passwords or any other access credentials as required. Attempting to discover another user’s password or attempts to gain unauthorized access to another person’s files or email is prohibited. Students are required to authenticate each time they log into the Blackboard learning management system to access their course(s) and complete course activities.

All online course work that is graded or contributes to a student’s grade is submitted via platforms connected to the College’s authentication processes. In addition, the College’s Student Information System provides instructors access to class rosters with photographs of the students. Live audio and video of students interacting in the course is also a feature of the Blackboard learning management system. For courses delivered through interactive video, the identity of the students may be further verified visually by the instructor. Additionally, faculty may choose to use e-proctoring software as an additional method of student verification. As technology and personal accountability are not absolute in determining a student’s identity, faculty members are encouraged to use these technologies and to design courses that use assignments and evaluations that support academic integrity.

At this time there are no additional student fees associated with student verification. In the event any verification fee is needed, it will be posted on the course registration site to provide an advance alert to students.

Manhattanville College complies fully with the provisions of the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. 1232g. This act protects the privacy of student information in distance education by requiring, with certain limited exceptions, that the student’s consent must be obtained before disclosing any personally identifiable information in the student’s education records.

## Responsibilities

Students
Students are responsible for providing their complete and true identity information in any identification verification process. It is against College policy for a user to give someone his or her password or to allow others to use his or her account (see the Manhattanville College Office of Information Technology Acceptable Technology Use Policy).

Executive Director of IT
- Responsible for administering this Policy as it pertains to processes and procedures in IT.

Interpreting Authority

The CIO and Provost’s Office are jointly responsible for developing and ensuring compliance with this policy in the College’s various Schools and administrative units. The Provost’s Office will inform School deans and administrative officers when changes to the policy are made. Administrative procedures that support this policy will be reviewed by both offices to ensure that any changes continue to ensure compliance.

Statutory or Regulatory References

34 CFR §602.17(g)

Relevant Links

Non-Discrimination and Harassment Policy, Policy 1.5.1
- Manhattanville Acceptable Technology Use Policy:

Policy Adoption Review and Approval

- Manhattanville Password Policy:
  https://www.mville.edu/sites/default/files/Password_Policy_FINAL.pdf
Recommended approval by President’s Cabinet on October...

Approved by Cabinet & President – October 28, 2020