

Title: Protection of Student Privacy in	Туре	Key Institutional	
Blended and Distance Education			
No: KI 1037	Approval Date: 12-18-2024		
Responsible Office: Registrar; VPAA/Provost	of Crumn Committe 12-17-20	Reviewed By: Dean of CLA, 11-25-2024; Dean of Holt, 11-25-2024; Associate Dean/COO of Crummer, 11-26-2024; VP Academic Affairs & Provost, 12-2-2024; CLA Curriculum Committee, 12-10-2024; CLA Executive Committee, 12-18-2024; Crummer Faculty, 12-17-2024; College Policy Committee, 12-17-2024; President's Cabinet, 12-18-2024; Approved By: President, 12-18-2024	
Next Review: 2029	Revision No: Original Approval; See <u>Section VII</u> this document for revisioning history.		

### I. Purpose/Introduction/Rationale

Rollins College takes seriously and has a long-standing commitment to protecting privacy rights for all students. The College provides for the proper use and protection of personal and institutional data, regardless of instructional delivery modality, including data associated with on-campus (face-to-face), blended, or fully online courses or programs. This policy applies particularly to students enrolled in blended or fully online courses or programs, and codifies Rollins' practice and application of existing policies and protections for students to meet the requirements of the College's institutional accreditor, the Southern Association of Colleges and Schools Commission on College (SACSCOC).

The College takes all measures required to protect the integrity of educational credentials and records of students engaging in courses delivered by blended or fully online delivery modalities by verifying student identity, protecting student privacy, notifying students of any special meeting times/locations, or additional fees/charges associated with student identity verification in blended or fully online courses or programs.

This policy applies to the educational records of all current and former Rollins College (Rollins) students, including those of the College of Liberal Arts (CLA), the Hamilton Holt School (Holt), and the Crummer Graduate School of Business (Crummer). All full- and part-time Rollins faculty, staff, and students are expected to adhere to and comply with this policy.

## **II. Definitions**

**Blended Instructional Modality.** Courses in which up to 49% of instruction is delivered via distance modalities, synchronous or asynchronous, and 51% of instruction is provided via face-to-face classroom interaction.

**Fully Online Instructional Modality.** Courses in which 50% or more of instruction is delivered via distance modalities, synchronous or asynchronous.

**Student**. Any person who is or has been enrolled at Rollins – CLA, Holt, or Crummer – whether physically present for on-campus (face-to-face) instruction or receiving instruction via electronic delivery modalities in blended or fully online courses or programs.

## III. Procedure or Application

Rollins is committed to protecting privacy rights for all students regardless of the instructional delivery modality of the courses or programs in which they are enrolled. Rollins privacy and information security policies (see <u>Section IV</u> of this document) that apply generally to all students and all courses are applicable whether or not the instructional modality is on-campus (face-to-face), blended, or fully on-line.

- ▶ Student privacy in blended or fully online courses or programs are protected through the use of secure usernames and passwords, and Rollins' use of secure access technologies and multi-factor identification, as described in the College's existing *Privacy Statement* and *General Data Protection Regulation Policy*.
- ▶ All Rollins personnel are required to follow Federal Family Educational Rights and Privacy Act (FERPA) and College guidelines for sharing student educational record information with other faculty, staff, parents, or others outside of the College, as described on the College's existing *FERPA Notification Webpage*.

- ► Students are responsible for providing complete and true information about themselves in all identity verification processes, in compliance with the College's existing <u>Code of Community Standards</u>, Electronic Device Misuse, and Academic Honor Code, Section II. Definitions of Academic Honor Code Violations, standards.
- ▶ At the discretion of the faculty instructor of record, any Rollins student enrolled in blended or fully online courses or programs may be required to complete a video interview or examination, for which a valid form of photo identification will be required.
- ► In addition to adhering to privacy protections that apply to all students (including the College's FERPA policy), all instructional faculty, full- or part-time adjunct, *must* adhere to the following guidelines when teaching blended or fully online courses.
  - All blended or fully online courses must be taught using Canvas<sup>®</sup>, Rollins' learning management system (LMS), and College-approved and supported videoconferencing technologies, e.g., Microsoft Teams<sup>®</sup> and/or Zoom<sup>®</sup>, to ensure the security of student course material, communication, student work submissions, and grades.
  - Faculty are required to use Canvas® to post course materials, send announcements, facilitate collaboration among students, collect student work, deliver tests and quizzes, and post grades.
  - Faculty are required to report final student grades as instructed by the Registrar using the College's single sign-on (SSO) *MyRollins* site, which is integrated securely to Banner™, the institution's enterprise resource planning (ERP) system.
  - Canvas® or Rollins' email systems must be used for all official, confidential communication, i.e., providing students with feedback on their work, releasing grade information to students, etc.
  - Student work, scores, and grades must be kept confidential. Students enrolled in a course must not have access to other students' work or grades for purposes other than peer review. No student may be assigned the role of instructor or teaching/graduate assistant in a Canvas® course in which they are enrolled as a student.
  - All Rollins email, Banner, and Canvas<sup>®</sup> account information must be kept secure and login information must not be shared with anyone. No one may be granted unauthorized access to the Canvas<sup>®</sup> course.
- External reviewers (e.g., accreditation, academic program review, etc.) may be granted access to Canvas® only by special request, must be approved through a non-disclosure agreement process, and are only temporarily enrolled in courses. This request and approval process originates with review by the department chair or program director, appropriate dean, assistant provost for institutional effectiveness, and senior director of Information Technology (IT) operations and planning.

# IV. Related Policies, Regulations, and Accreditation Standards

Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g; 34 CFR Part 99.

Southern Association of Colleges and Schools Commission on Colleges (SACSCOC), <u>Principles of Accreditation (2024 ed.)</u>, Standard 10.6 Distance and Correspondence Education (pp. 23-25).

Rollins College <u>Academic Honor Code</u>, Section II. Definitions of Academic Honor Code Violations (pp. 2-3).

Rollins College Code of Community Standards, Electronic Device Misuse (pp. 15-16).

Rollins College FERPA Notification Webpage.

Rollins College Privacy Statement and General Data Protection Regulation Policy.

# **V. Appendices/Supplemental Materials**

None.

### **VI. Effective Date**

This policy is effective December 18, 2024, and supersedes all previously issued versions.

# VII. Rationale for Revision(s)

Original approval.