

As a result of 2019 Accreditation and Innovation negotiated rule making, the Department updated regulations for policies that accrediting agencies must have related to verification of a student's identity in a distance education or correspondence program. An accrediting agency must have a policy that:

[34 CFR 602.17\(g\)](#) Requires institutions to have processes in place through which the institution establishes that a student who registers in any course offered via distance education or correspondence is the same student who academically engages in the course or program;

In their response, USDE did state that they would expect a school to have a reasonable procedure for verifying a student's identity when tracking whether the same student completed the clock-hour/s.

Accreditation will expect a school delivering asynchronous DE to use two (2) or more of these methods to in a good faith attempt to verify that the same student enrolled in the program is the same student completing the clock hours:

- 1. secure student login and passcode,**
- 2. dual or two-factor authentication**
- 3. proctored examinations,**
- 4. or other technology the institution can demonstrate is effective in verifying student identity.**

Per the clock hour definition updated during the same 2019 negotiated rulemaking period:

[34 CFR 600.2 Clock:](#)

- (iv) In distance education, 50 to 60 minutes in a 60-minute period of attendance in -
- (A) A synchronous or asynchronous class, lecture, or recitation where there is opportunity for direct interaction between the instructor and students; or
 - (B) An asynchronous learning activity involving academic engagement in which the student interacts with technology that can monitor and document the amount of time that the student participates in the activity.
- (2)
- (3) An institution must be capable of monitoring a student's attendance in 50 out of 60 minutes for each clock hour under this definition.

According to USDE, processes that ARE acceptable to monitor clock hours:

- 1. In SYNCHRONOUS delivery, the instructor(s) and students use a webcam process whereby the instructor monitors and interacts with students during scheduled class time, taking attendance and engaging with all students**
- 2. In an ASYNCHRONOUS setting, a school utilizes technology that monitor not only when a student log in, but captures all activity with an academic portal demonstrating everything a student does within a specific timeframe (e.g. scrolls through reading material, work on lessons, completes quiz, etc.)**

Accreditation expects an institution to use time and activity tracking technology that automatically generated time reporting and not requiring manual calculation and recording entries. Manual processes allow human risk for error and/or ease of opportunity for fraud.