

COVID-19 and Academic Integrity

April 1, 2020

Issue

Academic integrity is a broad topic. This document focuses on Federal regulations requiring institutions [to verify student identity](#), and guidance from regional accreditors on [COVID-induced changes to academic policies](#). In response to COVID-19, [USED has allowed accreditors flexibility](#) in enforcing these requirements.

Impacted

This issue impacts an institution's administrators in charge of accreditation, regulatory compliance, financial aid, instructional design, and academic affairs.

Effective Dates

According to USED, this flexibility applies “to students who enroll in payment periods that begin on or before June 1, 2020.” USED has not extended this flexibility beyond this date.

Background

[34 CFR 602.17\(g\)\(1\)](#) requires institutions to verify the identity of each student participating in a distance education course¹. For the purpose of Title IV compliance, this is a regulation that the accreditors enforce. [According to the March 5 memo](#), accreditors have discretion to waive this requirement: “We [USED] are also permitting accreditors to waive their distance education review requirements for institutions working to accommodate students whose enrollment is otherwise interrupted as a result of COVID-19.”

Regional accreditors, such as Higher Learning Commission (“HLC”), [have provided more general guidance as well](#): “The most common questions at this time are in regard to reducing the length of the academic year, assignment of incomplete or pass/fail grades, waiving graduation requirements, offering distance education and accelerated classes. HLC recognizes all these considerations as potential solutions an institution might contemplate as it navigates the unique circumstances of maintaining academic integrity during a public health emergency. Temporary alterations to policies and procedures permits institutions to document decisions that allows them to retrace their steps when the crisis has passed, while allowing their students to move forward.”

After providing examples of some alterations institutions could make, the Southern Association of Colleges and Schools’ Commission on Colleges reminds its institutions that it is not permissible to offer [“full course credit when the course was not completed.”](#)

¹ This regulation will be found as [34 CFR 602.17 \(g\)](#) starting July 1, 2020.

Recommended Action(s)

- **Check with your accreditor before making changes.** Guidance differs by accreditor.
- **Alert your accreditor:** If you make a change, let your accreditor know.
- **Focus on:** regular and substantive interaction, regardless of technologies deployed.
- **Keep a written record:** “We [USED] recommend that institutions document, as contemporaneously as possible, any actions taken as a result of COVID-19.”

Applicable regulations and policies

[34 CFR 602.17\(g\)\(1\)](#). (Moving to [34 CFR 602.17 \(g\)](#) starting July 1, 2020.)

[Guidance from SACS](#)

[Guidance from HLC](#)

[The USED Memo of March 5](#)