

# Pandemic Response: Online Exam Security & Academic Integrity Considerations for Online Testing

The following checklist is for informational purposes and is not legal advice. Please consult your attorney for specific legal guidance.

## Checklist for the Institution / Program

Initial Assessment Considerations	Yes	No	Notes / reminders
Do you have a testing window (as opposed to a test event where all test takers test at same time)?			
Will you require submission of audio or other others (e.g. computer code, demos)?			
Do you have multiple forms of the test?			
Have you defined what technology is needed to securely test? (e.g., lockdown browser, webcam, etc.)			
Have you accounted for the number of test takers needing to be tested?			
Have you considered what test takers should have available to them during the test?			
Do you have a plan for administrator/educator and proctor training?			
Have you considered how you will handle accommodations (such as extended time or a screen reader)?			
Identification	Yes	No	Notes / reminders
Have you determined the type of identification you will require (e.g. roll call, personal recognition, identification card, government issued photo identification, biometrics)?			
Will you require the test taker to present an identification card?			
<ul style="list-style-type: none"> <li>• If yes, what type? (e.g. School ID; government issued photo ID, etc.)</li> </ul>			
<ul style="list-style-type: none"> <li>• If yes, what “matching criteria” will you use? (e.g. photo, name, etc.)</li> </ul>			
<ul style="list-style-type: none"> <li>• If yes, how are you recording this activity or information (e.g. checklist, photo of ID, etc.)</li> </ul>			See Sample Checklist below
<ul style="list-style-type: none"> <li>• Do you have documentation to capture how you will use this information?</li> </ul>			
<ul style="list-style-type: none"> <li>• Do you have a written plan that directs the actions you want a proctor to take if they have concerns that the identification card does not match?</li> </ul>			
Will you capture biometric data for identification? If yes:			
<ul style="list-style-type: none"> <li>• What type? (e.g. facial recognition, voice recognition, etc.)</li> </ul>			

Developed with contributions from Donna McPartland, JD (McPartland Privacy Advising, LLC), Rachel R. Watkins Schoenig, JD (Cornerstone Strategies, LLC), Jarret Dyer (NCTA), and Ray Nicosia (ETS). This information is for legal purposes and not intended as legal advice. You should consult your attorney for specific legal guidance. You have permission to use this document or variations of it with the requirement that you retain this footer. You are not authorized to resell or otherwise commercialize this document.

• What “matching criteria” will you use? (e.g. photo, name, etc.)			
• Do you have documentation to capture how you will use this information?			
Have you notified the test taker of what information you are gathering and how it will be used?			See Privacy Considerations
Do you have a secure storage and retention plan for any photos or biometrics captured?			
<b>Expectations and Agreements</b>	Yes	No	Notes / reminders
Will you remind students of the applicable Honor Code?			
Do you have additional test specific expectations to provide the test taker?			
• Do you know how you will provide those additional expectations (e.g., on screen, by email)?			
Do you plan to capture test taker agreement to testing rules?			
• If so, do you know how you will capture a record of the agreement (e.g., electronic signature, verbal consent)?			Consider FERPA requirements here
• If so, do you know how you will store the agreement?			
<b>Test Monitoring Considerations</b>	Yes	No	Notes / reminders
Have you decided the type of monitoring (self, record, record and review, live online proctoring)?			
Have you defined what is authorized behavior? (e.g., open book v. clear desk)			
Have you defined consequences for engaging in unauthorized behavior?			
Have you communicated this information to the test taker?			
Will this be a live proctored event? If yes:			
• Have you communicated to the proctor what is considered authorized and unauthorized behavior and the consequences for same?			
• Have you identified when the proctor should intervene?			
• Have you defined how the proctor should report concerns?			
• Have you provided instructions how and to whom a report should be delivered?			
• Do you need to prepare proctor training materials?			
• Will you audit the proctor’s performance?			
Will this be a record and review event? If yes:			
• Who will review the event?			
• Have you communicated what behavior is authorized?			

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<ul style="list-style-type: none"> <li>Have you defined how the reviewer should report concerning behavior (e.g. time stamp, suspect behavior)?</li> </ul>			
<ul style="list-style-type: none"> <li>Have you provided instructions to the reviewer regarding how and to whom a report should be delivered?</li> </ul>			
<b>Post-Test Considerations</b>	Yes	No	Notes / reminders
Will you remind test takers again of confidentiality expectations?			
Are you planning any post-test analyses?			
Is there a process for students suspected of engaging in unauthorized or irregular behavior?			
Do you know how you will retain test results and proctor reports?			
<b>Privacy Considerations</b>	Yes	No	Notes / reminders
Are you using a third party vendor to help deliver your online test or monitor test takers?			
Is the vendor acting under the “school official” exception of FERPA so consent from student/parent/guardian is not required?			
Are state laws and school requirements being followed by vendors? <ul style="list-style-type: none"> <li>Written contract requirements</li> <li>Legitimate educational purpose</li> <li>Specify PII collected</li> <li>No sale, rental, licensing of student PII</li> <li>No target ads/profiling (k-12); opt out</li> <li>Encryption</li> <li>Protection of student PII</li> <li>Nondisclosure of PII</li> </ul>			
Have you or your vendor provided clear, easily understandable notice to students about new procedures?			
If applicable, have you included international requirements? (Lawful bases, individual rights, etc)			
Are students provided with notice of test security measures used and the purpose? <ul style="list-style-type: none"> <li>state issued id (stored or not)</li> <li>camera monitoring (surroundings, keyboard, other)</li> <li>browser lockdown</li> <li>keystroke monitoring</li> <li>AI/Machine learning to detect cheating, IP misuse)</li> <li>Biometric usage (note state restrictions in IL and NYCPS)</li> </ul>			
Have students been advised to follow protective steps? (watch-outs for phishing, use of VPN, multifactor authentication)			

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## Sample Checklist for Proctor

<b>Identification</b>	Yes	No	Notes / reminders
Is identification required?			
Did the test taker present the correct type of identification?			
Does the photo match the presenter?			
Does the name on the ID match the name on the roster?			
<b>Authorized Behavior</b>			
Are testing aides permitted?			
Are accommodations approved?			
Is a clear desk required?			
Did any irregularities arise during the assessment event?			

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